

RECEIVED

JUN 13 2002

CUDDY & FEDER & WORBY LLP

90 MAPLE AVENUE
WHITE PLAINS, NEW YORK 10601-5196

CONNECTICUT
CUDDY & FEDER
1971-1995

NEIL ALEXANDER (also CT)
CHARLES T. BAZADLO (also NJ)
THOMAS R. BEMENT (also DC)
THOMAS M. BLOOMER
JOSEPH P. CARLICC
KENNETH DUBROFF
ROBERT FISHER
CHRISTOPHER B. FISHER (also CT)
ANTHONY B. GOTFRE, III (also CT)
AUSAN H. GORDON
KAREN C. GRANIK
JUDITH A. GRAHER
WAYNE H. HELLER (also CT)
KENNETH L. JURIST
MICHAEL KATZ (also NJ)
JOSHUA E. KLEINGELD (also CT)
DANIEL L. LEARY (also CT)
BARRY L. LONG

(914) 761-1300
TELECOPIER (914) 761-5372/6405

500 111TH AVENUE
NEW YORK, NEW YORK 10101
(212) 944-2841
TELECOPIER (212) 944-2843

WESTAGE BUSINESS CENTER
300 SOUTH LAKE DRIVE
FISHKILL, NEW YORK 12524
(845) 896-2220
TELECOPIER (845) 896-3672

STAMFORD, CONNECTICUT
NORWALK, CONNECTICUT

WILLIAMS NUII
DAWN M. PORTNEY
ELISABETH N. RADOW
NEIL T. RIMSKY
RUTH L. ROTH
JENNIFER L. VAN TUYI
CHAUNCEY L. WALKER (also CA)
ROBERT L. WOITZ
DAVID E. WORBY

OF Counsel
MICHAEL R. EDELMAN
ANDREW A. GLICKSON (also CT)
ROBERT L. OSAR (also TX)
MARYANN PAULRMO
ROBERT C. SCHNEIDER
LOUIS R. TAMARA

TO: David Martin, Connecticut Siting Council

FROM: Christopher B. Fisher, Esq.

TELECOPIER NO. 860-827-2950

DATE: 6/13/02 PAGES: 3 CLIENT 1844 MATTER: 683
(Including Cover)

MESSAGE:

IMPORTANT NOTICE: The accompanying fax transmission is intended to be viewed and read only by the individual or entity named above. If you are not the intended recipient so named, you are prohibited from reading this transmission. You are also notified that any dissemination, distribution or copying of this transmission is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original transmission to us by the U.S. Postal Service. Thank you.

OPERATOR: Rach Jagers (914) 761-1300 Ext. 256
IF THERE ARE ANY PROBLEMS, PLEASE NOTIFY OPERATOR IMMEDIATELY

CUDDY & FEDER & WORBY LLP

90 MAPLE AVENUE
WHITE PLAINS, NEW YORK 10601-5196

(914) 761-1300

TELECOPIER (914) 761-5372/6405

www.cfwlaw.com

500 FIFTH AVENUE
NEW YORK, NEW YORK 10110
(212) 944-2841
TELECOPIER (212) 944-2843

WESTAGE BUSINESS CENTER
800 SOUTH LAKE DRIVE
FISHKILL, NEW YORK 12524
(845) 898-2220
TELECOPIER (845) 898-3672

STAMFORD, CONNECTICUT
NORWALK, CONNECTICUT

CUDDY & FEDER
1971-1995

NEIL J. ALEXANDER (also CT)
CHARLES T. BAZZANO (also NJ)
THOMAS R. BLUMBERG (also NJ)
MICHAEL M. BLOOMBERG
JEREMY D. CAGLIARDI
KENNETH J. DUNNICK
ROBERT E. FALLO
CHRISTOPHER B. GIBSON (also CT)
ANTHONY G. GIBSON JR. (also CT)
JUDITH H. GORDON
KARL G. GRABER
JOSHUA J. GRABER
WAYNE E. HENRY (also CT)
KENNY D. JONES
ERIC J. L. KATZ (also NJ)
JOSHUA L. KATZ (also NJ)
FRANK L. LEBLANC (also CT)
BARRY E. LOBO

WILLIAM S. MILL
DAWN M. POITNEY
ELISABETH N. RADDAW
NEIL T. RILSKY
RUTH E. ROTH
JENNIFER L. VAN DYKE
CHAUNCEY L. WALKER (also CA)
ROBERT L. WOLFE
DAVID E. WOLFE

Of Counsel
MICHAEL H. COFFMAN
ANDREW A. CLACKSON (also CT)
ROBERT L. OSAR (also TX)
MAIYANN M. PAULINO
ROBERT C. SCHAFER
LOUIS B. TATIANA

June 13, 2002

VIA FACSIMILE (860) 827-2950

David Martin
Siting Analyst
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

Re: DM-AT&T-070-020604 Killingworth

Dear Mr. Martin:

In response to your correspondence dated June 13, 2002 for the above referenced site, please be advised that AT&T's Horn Antennas were excluded from the MPE analysis because they are a redundant back up system that is not currently operational (See note on page 2 of our filing stating same). Even if the Horn Antennas were operational, it should be noted that they are microwave point to point antennas and would not add to the cumulative MPE for the site at grade given their highly directional path.

Additionally, the structural analysis as prepared by James E. Boltz utilized the original tower design and included two horn antennas at the 302.5' level and two horn antennas at the 187.5' level of the tower in the structural analysis. The tower currently supports only three of the original four horn antennas which are apparently still needed by AT&T in its landline infrastructure as a backup system. As such, the structural is overly conservative.

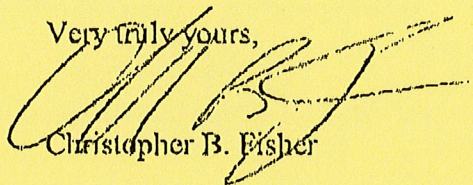
CUDDY & FEDER & WORBY LLP

June 13, 2002

Page 2

Should you or the Council have any questions or require any additional information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read "CB Fisher", written over the typed name.

Christopher B. Fisher

CUDDY & FEDER & WORBY LLP

90 MAPLE AVENUE
WHITE PLAINS, NEW YORK 10601-5196

(914) 761-1300

TELECOPIER (914) 761-5372/6405

www.cfwlaw.com

500 FIFTH AVENUE
NEW YORK, NEW YORK 10110
(212) 944-2841
TELECOPIER (212) 944-2843

WESTAGE BUSINESS CENTER
300 SOUTH LAKE DRIVE
FISHKILL, NEW YORK 12524
(845) 896-2229
TELECOPIER (845) 896-3672

STAMFORD, CONNECTICUT
NORWALK, CONNECTICUT

CUDDY & FEDER
1971-1995

WILLIAM S. NULL
DAWN M. PORTNEY
ELISABETH N. RADOW
NEIL T. RIMSKY
RUTH E. ROTH
JENNIFER L. VAN TUYL
CHAUNCEY L. WALKER (also CA)
ROBERT L. WOLFE
DAVID E. WORBY

Of Counsel
MICHAEL R. EDELMAN
ANDREW A. GLICKSON (also CT)
ROBERT L. OSAR (also TX)
MARYANN M. PALERMO
ROBERT C. SCHNEIDER
LOUIS R. TAFFERA

NEIL J. ALEXANDER (also CT)
CHARLES T. BAZYDLO (also NJ)
THOMAS R. BEIRNE (also DC)
THOMAS M. BLOOMER
JOSEPH P. CARLUCCI
KENNETH J. DUBROFF
ROBERT FEDER
CHRISTOPHER B. FISHER (also CT)
ANTHONY B. GIOFFRE III (also CT)
SUSAN E.H. GORDON
KAREN G. GRANIK
JOSHUA J. GRAUER
WAYNE E. HELLER (also CT)
KENNETH F. JURIST
MICHAEL L. KATZ (also NJ)
JOSHUA E. KIMERLING (also CT)
DANIEL F. LEARY (also CT)
BARRY E. LONG

June 11, 2002

VIA FACSMILIE (860) 827-2950)

AND FEDERAL EXPRESS

David Martin

Siting Analyst

Connecticut Siting Council

10 Franklin Square

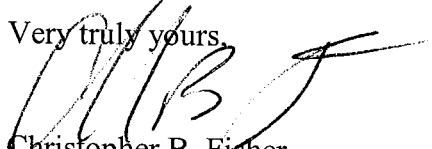
New Britain, Connecticut 06051

Re: EM-AT&T-092-020530 New Hartford
EM-AT&T-070-020604 Killingworth
EM-AT&T- Tolland

Dear Mr. Martin:

On behalf of AT&T Wireless, enclosed please find revised RF Exposure Reports for the above referenced facilities in New Hartford and Killingworth to address your correspondence. With respect to AT&T's recent filings, the worst case number of channels used in the analyses has been revised to 12 versus 16 based on information recently provided by Nokia which manufactures the equipment. With respect to the Tolland facility, it is our understanding that the MPE report accurately reflects existing transmission antennas on the tower and the drawings are being revised accordingly. We hope to submit those drawings shortly as either a supplement to our submission or a post-acknowledgment filing. Should you or the Council have any questions or require any additional information, please do not hesitate to contact us.

Very truly yours,


Christopher B. Fisher



RF Exposure Analysis for Proposed AT&T Wireless Antenna Facility

SITE ID: 907-007-848

June 7, 2002

Prepared by AT&T Wireless Services, Inc.
Nader Soliman **RF Engineer**

RECEIVED
JUN 12 2002
CONNECTICUT
SITING COUNCIL

Table of Contents

1. INTRODUCTION	3
2. SITE DATA.....	3
3. RF EXPOSURE PREDICTION.....	3
4. FCC GUIDELINES FOR EVALUATING THE ENVIRONMENTAL EFFECTS OF RF RADIATION 4	4
5. COMPARISON WITH STANDARDS	4
6. CONCLUSION	4
7. FCC LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE	5
8. EXHIBIT A	6
9. FOR FURTHER INFORMATION.....	7
10. REFERENCES	7

1. Introduction

This report constitutes an RF exposure analysis for the proposed AT&T Wireless antenna facility to be located at 131 Little City Road, Killingworth, CT. This analysis uses site-specific engineering data to determine the predicted levels of radio frequency (RF) electromagnetic energy in the vicinity of the proposed facility and compares those levels with the Maximum Permissible Exposure (MPE) limits established by the Federal Communications Commission.

2. Site Data

Site Name: Partridge Hallow	
Number of simultaneously operating channels	16
Type of antenna	Allgon 7250.03
Power per channel (Watts ERP)	250.0 Watts
Height of antenna (feet AGL)	140.00 feet
Antenna Aperture Length	5 feet

3. RF Exposure Prediction

The following equations established by the FCC, in conjunction with the site data, were used to determine the levels of RF electromagnetic energy present in the vicinity of the proposed facility¹:

$$PowerDensity = \frac{0.64 * N * EIRP(\theta)}{\pi * R^2} (mW/cm^2)$$

Eq. 1-Far-field

Where, N = Number of channels, R = distance in cm from the RC (Radiation Center) of antenna, and $EIRP(\theta)$ = The isotropic power expressed in milliwatts in the direction of prediction point. This is the correct equation for antennas which have their gain expressed in dBi, which is the usual case for the PCS bands.

$$PowerDensity = \frac{P_{in} / ch * N * 10^3}{2 * \pi * R * h * \alpha / 360} (mW/cm^2)$$

Eq. 2-Near-field

Where P_{in}/ch = Input power to antenna terminals in watts/ch, R = distance to center of radiation, h = aperture height in meters, α = 3 dB beam-width of horizontal pattern.

¹ RF exposure is measured and predicted in terms of power density in units of milliwatts (mW), a thousandth of a watt, or microwatts (μ W), a millionth of a watt, per square centimeter (cm^2). Data comparing predictive analysis with on site measurements has demonstrated that power density can be effectively predicted at given locations in the vicinity of a wireless antenna facility.

4. FCC Guidelines for Evaluating the Environmental Effects of RF Radiation

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by a Second Memorandum Opinion and Order. These new rules represent a consensus of the federal agencies responsible for the protection of public health and the environment, including the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the National Institute for Occupational Health and Safety (NIOSH), and the Occupational Safety and Health Administration (OSHA).

Under the laws that govern the delivery of wireless communications services in the United States, as amended by the Telecommunications Act of 1996, the FCC has exclusive jurisdiction over RF emissions from personal wireless antenna facilities, which include cellular, PCS, messaging and aviation sites.² Pursuant to its authority under federal law, the FCC has established rules to regulate the safety of emissions from these facilities.

5. Comparison with Standards

Exhibit A shows the levels of RF electromagnetic energy as one moves away from the antenna facility. As shown in Exhibit A, the maximum power density is 0.000509 mW/cm² which occurs at 1800 feet from the antenna facility. The chart in exhibit A also shows that the power density is only 0.000100 mW/cm² at a distance of 4 feet. Table 1 below shows the Maximum Permissible Exposure (MPE) limits established by the FCC. There are different MPE limits for public/uncontrolled and occupational/controlled environments.

Table 1: Maximum Permissible Exposure limits for RF radiation

Frequency	Public/Uncontrolled	Occupational/controlled	Maximum power density at Accessible location
Cellular	.580 mW/cm ²	2.9 mW/cm ²	0.000509 mW/cm ²
PCS	1 mW/cm ²	5 mW/cm ²	

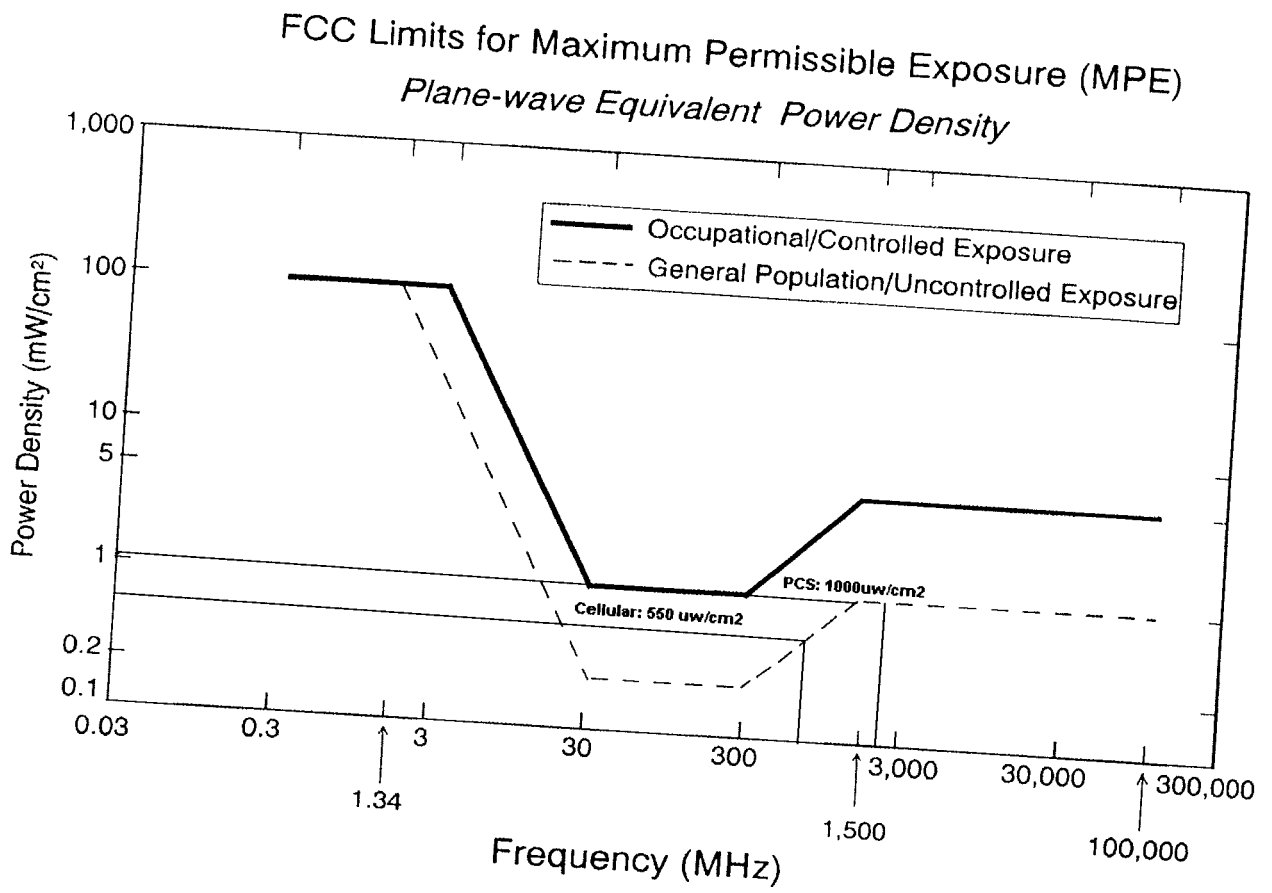
The maximum power density at the proposed facility represents only 0.06% of the public MPE limit for PCS frequencies.

6. Conclusion

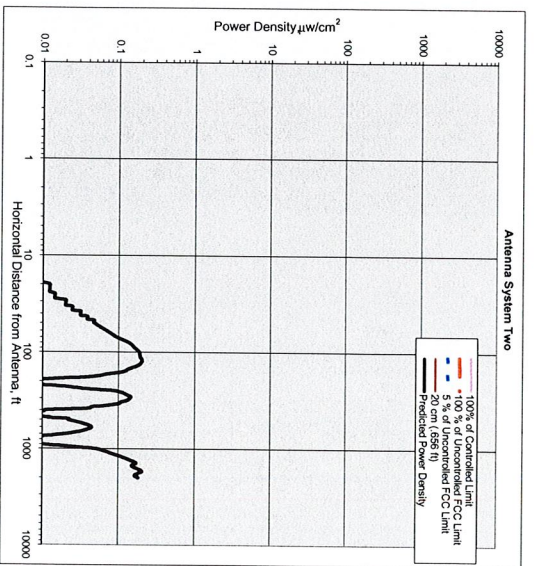
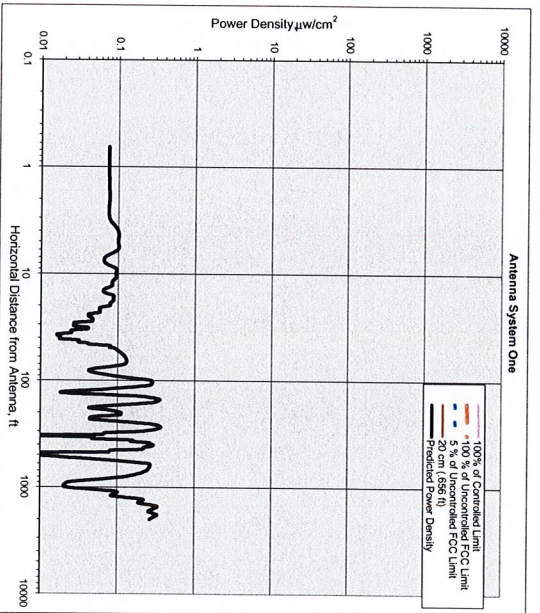
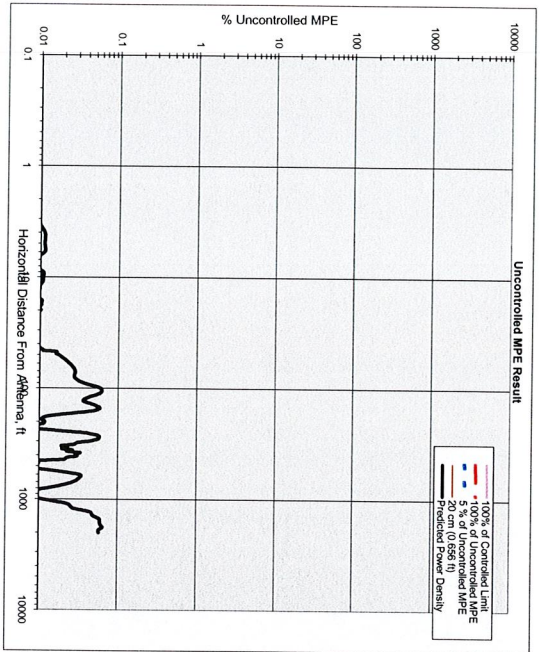
This analysis show that the maximum power density in accessible areas at this location is 0.005090 mW/cm², a level of RF energy that is well below the Maximum Permissible Exposure limit established by the FCC.

² 47 U.S. C. Section 332 (c) (7)(B)(iv) states that "[n]o State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."

7. FCC Limits for Maximum Permissible Exposure



8. Exhibit A



Number of Antenna Systems: 2

Meets FCC Controlled Limits for The Antennas Systems.

Meets FCC Uncontrolled Limits for The Antenna Systems.

Meets 5% of FCC Uncontrolled Limits for The Antenna Systems.

No Further Maximum Permissible Exposure (MPE) Analysis Required.

Power Density	Power Density	@Horiz. Dist.
mW/cm²	% of limit	feet
Maximum Power Density = 0.000509	0.06	1800.00
1.545, 47 times lower than the MPE limit for uncontrolled environment		
Composite Power (ERP) = 8,000.00 Watts		

Site ID: 907-007-848
 Site Name: Partridge Hollow
 Site Location: 131 Little City Road
 Killingworth, CT
 Performed By: Nader Soliman
 Date: 6/7/2002

Antenna System One

units	Value
Frequency MHz	1945.00
# of Channels	16
Max ERP/Ch Watts	250.00
Max Pwr/Ch into Ant. Watts	5.86
(Center of Radiator)	140.00
Calculation Point (above ground or roof surface)	0.00
Antenna Model No.	Algon 7250.03
Max Ant Gain dBi	16.30
Down tilt degrees	0.00
Miscellaneous Att. dB	0.00
Height of aperture feet	5.11
Ant HBW degrees	65.00
Distance to Antenna feet	137.45
WOS?	n

Ant System ONE Owner: AT&T
 Sector: 3
 Azimuth: 60/180/280

Antenna System Two

units	Value
Frequency MHz	851.00
# of Channels	16
Max ERP/Ch Watts	250.00
Max Pwr/Ch into Ant. Watts	18.53
(Center of Radiator)	253.00
Calculation Point (above ground or roof surface)	0.00
Antenna Model No.	ALP9011
Max Ant Gain dBi	11.30
Down tilt degrees	0.00
Miscellaneous Att. dB	0.00
Height of aperture feet	4.00
Ant HBW degrees	95.00
Distance to Antenna feet	251.00
WOS?	n

Ant System TWO Owner: Nextel
 Sector: 3
 Azimuth: 0/120/140

9. For Further Information

Additional information about the environmental impact of RF energy from personal wireless antenna facilities can be obtained from the Federal Communications Commission:

Dr. Robert Cleveland
Federal Communications Commission
Office of Engineering and Technology
Washington, DC 20554

RF Safety Program: 202-418-2464
Internet address: rfsafety@fcc.gov
RF Safety Web Site: www.fcc.gov/oet/rfsafety

10. References

- [1] The Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 U.S.C. Section 332 (c)(7)(B)(iv).
- [2] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Notice of Proposed Rulemaking, ET Docket 93-62, 8 FCC Rcd 2849 (1993).
- [3] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Report and Order, ET Docket 93-62, FCC 96-326, adopted August 1, 1996. 61 Federal Register 41006 (1996).
- [4] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Second Memorandum Opinion and Order, ET Docket 93-62, adopted August 25, 1997.
- [5] *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields*, OET Bulletin 65, August, 1997.



**RF Exposure Analysis for Proposed
AT&T Wireless Antenna Facility**

SITE ID: 913-008-673

June 04, 2002

Prepared by AT&T Wireless Services, Inc.
Prabhakar K. Rughoobur, RF Engineer

RECEIVED

JUN 12 2002
CONNECTICUT
SITING COUNCIL

Table of Contents

1. INTRODUCTION	3
2. SITE DATA	3
3. RF EXPOSURE PREDICTION	3
4. FCC GUIDELINES FOR EVALUATING THE ENVIRONMENTAL EFFECTS OF RF RADIATION 4	
5. COMPARISON WITH STANDARDS.....	4
6. CONCLUSION	4
7. FCC LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE	5
8. EXHIBIT A.....	6
9. FOR FURTHER INFORMATION.....	7
10. REFERENCES.....	7

1. Introduction

This report constitutes an RF exposure analysis for the proposed AT&T Wireless antenna facility to be located at 120 Industrial Park Access Rd, New Hartford CT. This analysis uses site-specific engineering data to determine the predicted levels of radio frequency (RF) electromagnetic energy in the vicinity of the proposed facility and compares those levels with the Maximum Permissible Exposure (MPE) limits established by the Federal Communications Commission.

2. Site Data

Site Name: New Hartford East	
Number of simultaneously operating channels	12
Type of antenna	Allgon 7250.03
Power per channel (Watts ERP)	250.0 Watts
Height of antenna (feet AGL)	137.00 feet
Antenna Aperture Length	5 feet

3. RF Exposure Prediction

The following equations established by the FCC, in conjunction with the site data, were used to determine the levels of RF electromagnetic energy present in the vicinity of the proposed facility¹:

$$PowerDensity = \frac{0.64 * N * EIRP(\theta)}{\pi * R^2} (mW/cm^2) \quad Eq. 1-Far-field$$

Where, N = Number of channels, R = distance in cm from the RC (Radiation Center) of antenna, and $EIRP(\theta)$ = The isotropic power expressed in milliwatts in the direction of prediction point. This is the correct equation for antennas which have their gain expressed in dBi, which is the usual case for the PCS bands.

$$PowerDensity = \frac{P_{in} / ch * N * 10^3}{2 * \pi * R * h * \alpha / 360} (mW/cm^2) \quad Eq. 2-Near-field$$

Where P_{in}/ch = Input power to antenna terminals in watts/ch, R = distance to center of radiation, h = aperture height in meters, α = 3 dB beam-width of horizontal pattern.

¹ RF exposure is measured and predicted in terms of power density in units of milliwatts (mW), a thousandth of a watt, or microwatts (μ W), a millionth of a watt, per square centimeter (cm^2). Data comparing predictive analysis with on site measurements has demonstrated that power density can be effectively predicted at given locations in the vicinity of a wireless antenna facility.

4. FCC Guidelines for Evaluating the Environmental Effects of RF Radiation

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by a Second Memorandum Opinion and Order. These new rules represent a consensus of the federal agencies responsible for the protection of public health and the environment, including the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the National Institute for Occupational Health and Safety (NIOSH), and the Occupational Safety and Health Administration (OSHA).

Under the laws that govern the delivery of wireless communications services in the United States, as amended by the Telecommunications Act of 1996, the FCC has exclusive jurisdiction over RF emissions from personal wireless antenna facilities, which include cellular, PCS, messaging and aviation sites.² Pursuant to its authority under federal law, the FCC has established rules to regulate the safety of emissions from these facilities.

5. Comparison with Standards

Exhibit A shows the levels of RF electromagnetic energy as one moves away from the antenna facility. As shown in Exhibit A, the maximum power density is 0.001503 mW/cm² which occurs at 260 feet from the antenna facility. The chart in exhibit A also shows that the power density is only 0.000200 mW/cm² at a distance of 4 feet. Table 1 below shows the Maximum Permissible Exposure (MPE) limits established by the FCC. There are different MPE limits for public/uncontrolled and occupational/controlled environments.

Table 1: Maximum Permissible Exposure limits for RF radiation

<i>Frequency</i>	<i>Public/Uncontrolled</i>	<i>Occupational/controlled</i>	<i>Maximum power density at Accessible location</i>
Cellular	.580 mW/cm ²	2.9 mW/cm ²	0.001503 mW/cm ²
PCS	1 mW/cm ²	5 mW/cm ²	

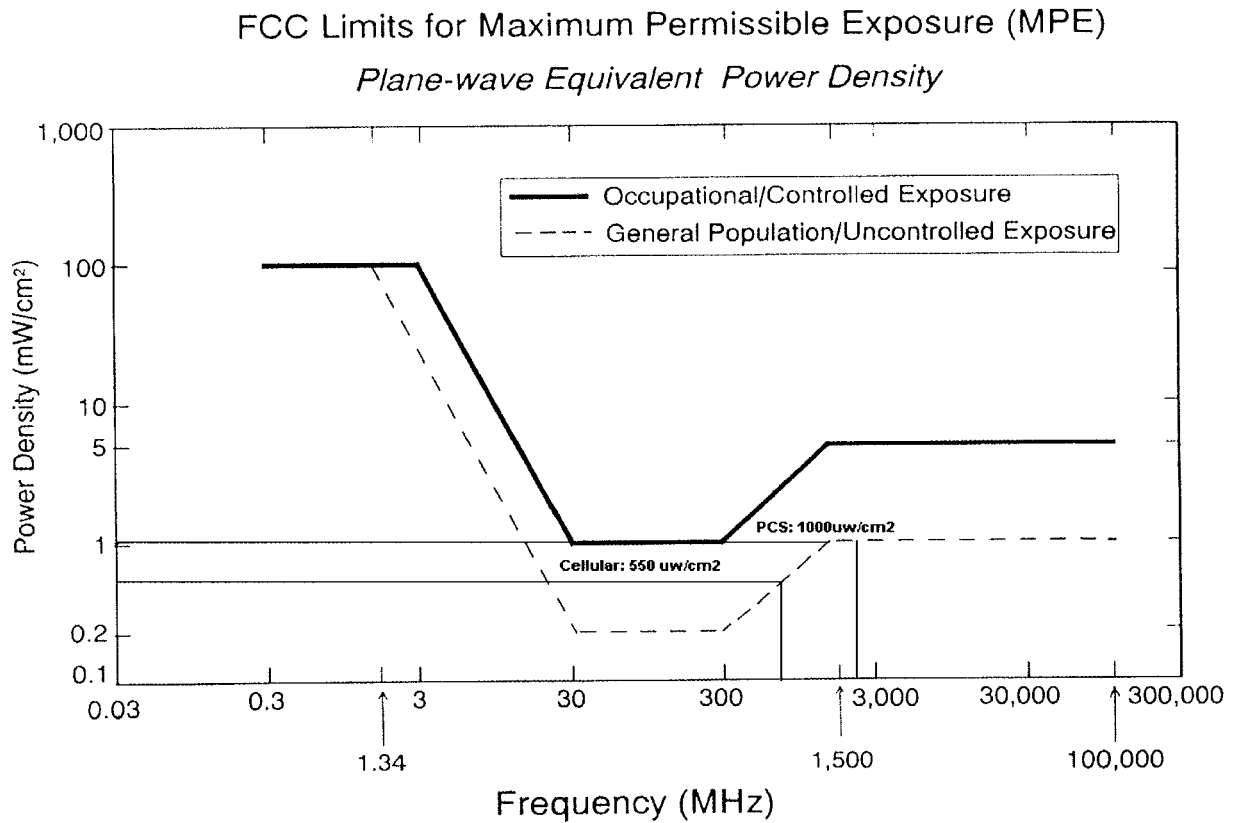
The maximum power density at the proposed facility represents only 0.24% of the public MPE limit for PCS frequencies.

6. Conclusion

This analysis show that the maximum power density in accessible areas at this location is 0.001503 mW/cm², a level of RF energy that is well below the Maximum Permissible Exposure limit established by the FCC.

² 47 U.S. C. Section 332 (c) (7)(B)(iv) states that “[n]o State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission’s regulations concerning such emissions.”

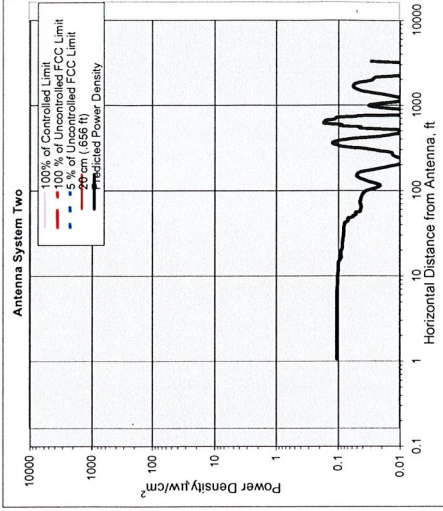
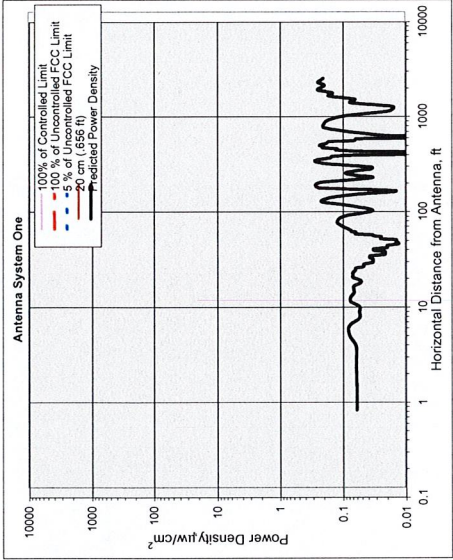
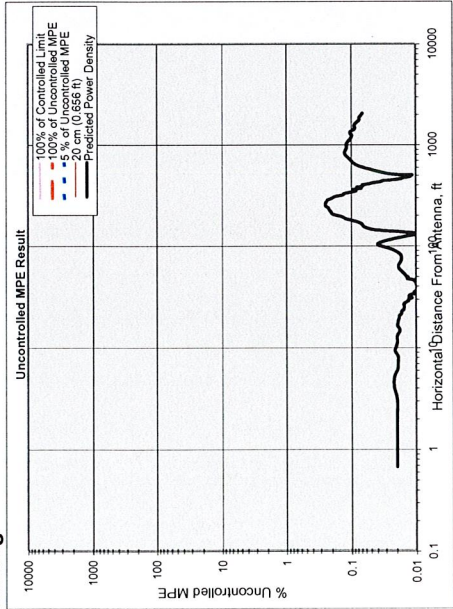
7. FCC Limits for Maximum Permissible Exposure



AT&T Wireless Services, Inc.

8. Exhibit A

Heading



Number of Antenna Systems: 3
Meets FCC Controlled Limits for The Antennas Systems.

Meets FCC Uncontrolled Limits for The Antenna Systems.

Meets 5% of FCC Uncontrolled Limits for The Antenna Systems.

No Further Maximum Permissible Exposure (MPE) Analysis Required.

	Power Density	@Hortz. Dist.
	mW/cm²	feet
Maximum Power Density =	0.001503	0.24
417.49 times lower than the MPE limit for uncontrolled environment		260.00
Composite Power (ERP) =	9,000.00	Watts

Site ID: 913-009-673
Site Name: New Hartford East
Site Location: 120 Industrial Park Access Rd
New Hartford, CT

Performed By: Bhakar K. Rughobur

Date: 6/4/02

Antenna System Two

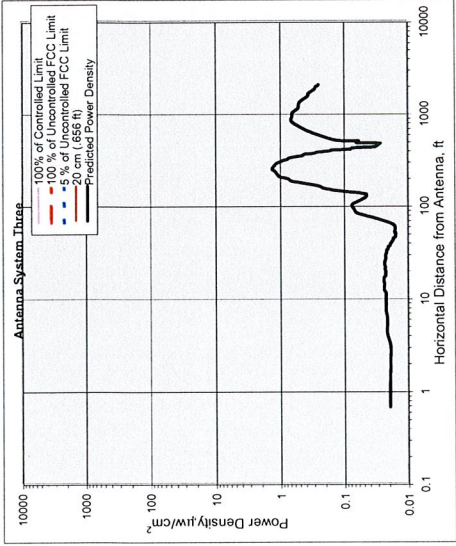
	units	Value
Frequency	MHz	1930.00
# of Channels	#	12
Max ERP/Ch	Watts	250.00
Max Pwr/Ch Into Ant.	Watts	7.73
Max Pwr/Ch (Center of Radiator)	feet	157.00
Calculation Point (above ground or roof surface)	feet	0.00
Antenna Model No.		DB980G90
Max Ant Gain	dBd	15.10
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	5.00
Ant. HBW	degrees	90.00
Distance to Ant. base	feet	154.50
WOS?	Y/N?	n

Ant System TWO Owner: Sprint
Sector: 3
Azimuth: 0/120/270

Antenna System One

	units	Value
Frequency	MHz	1945.00
# of Channels	#	12
Max ERP/Ch	Watts	250.00
Max Pwr/Ch Into Ant.	Watts	5.86
Max Pwr/Ch (Center of Radiator)	feet	137.00
Calculation Point (above ground or roof surface)	feet	0.00
Antenna Model No.		Aligon 7250 03
Max Ant Gain	dBd	16.30
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	5.11
Ant. HBW	degrees	65.00
Distance to Ant. base	feet	134.45
WOS?	Y/N?	n

Ant System ONE Owner: AT&T
Sector: 3
Azimuth: 60/180/300



Antenna System Three

	units	Value
Frequency	MHz	880.00
# of Channels	#	12
Max ERP/Ch	Watts	250.00
Max Pwr/Ch Into Ant.	Watts	13.43
(Center of Radiator)	feet	147.00
Calculation Point	feet	0.00
(above ground or roof surface)	feet	0.00
Antenna Model No.		DB844H80E.XY
Max Ant Gain	dBd	12.70
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	4.00
Ant HBW	degrees	80.00
Distance to Ant _{beam}	feet	145.00
WOS?	Y/N?	n

Ant System Three Owner: Verizon
Sector: 3
Azimuth 01120/240

9. For Further Information

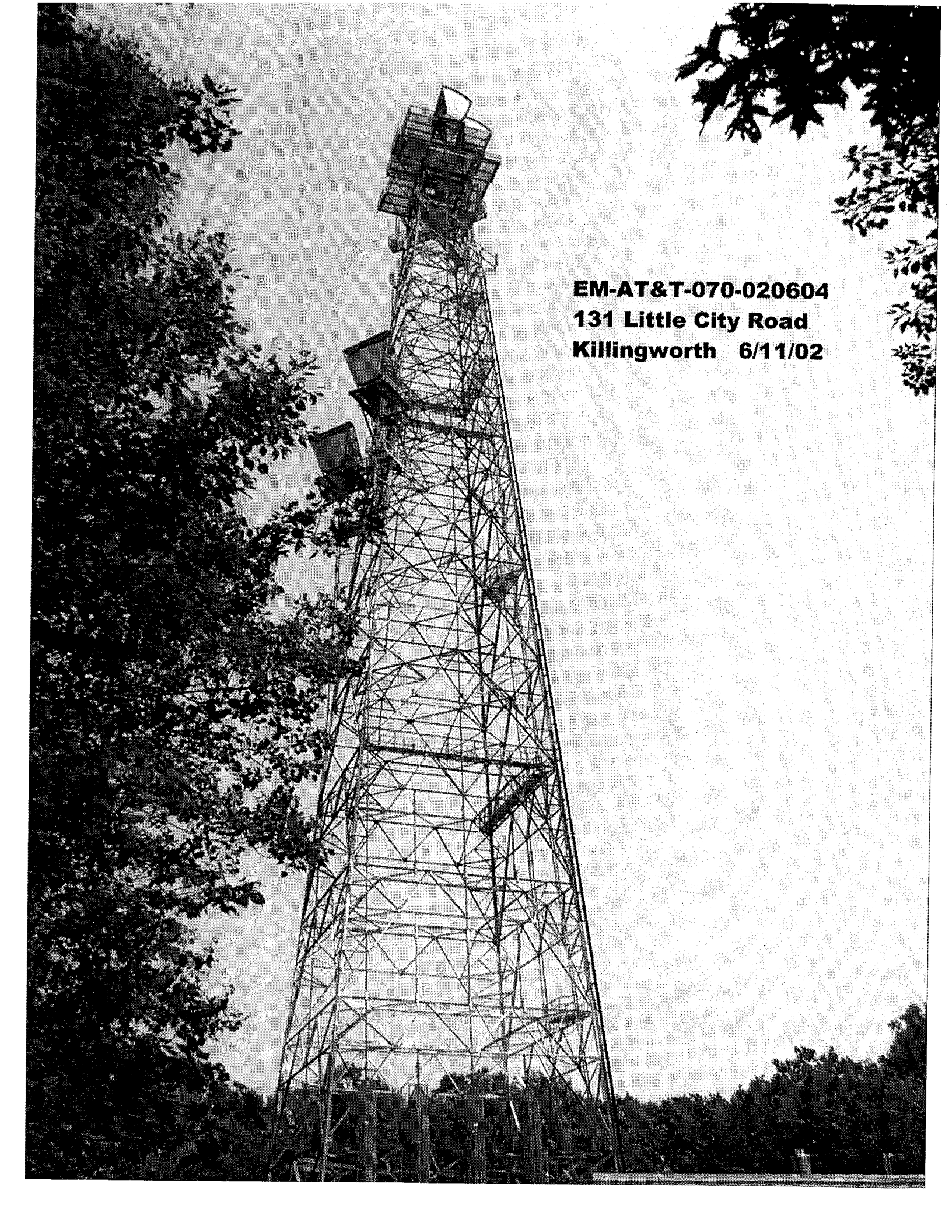
Additional information about the environmental impact of RF energy from personal wireless antenna facilities can be obtained from the Federal Communications Commission:

Dr. Robert Cleveland
Federal Communications Commission
Office of Engineering and Technology
Washington, DC 20554

RF Safety Program: 202-418-2464
Internet address: rfsafety@fcc.gov
RF Safety Web Site: www.fcc.gov/oet/rfsafety

10. References

- [1] The Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 U.S.C. Section 332 (c)(7)(B)(iv).
- [2] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Notice of Proposed Rulemaking, ET Docket 93-62, 8 FCC Rcd 2849 (1993).
- [3] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Report and Order, ET Docket 93-62, FCC 96-326, adopted August 1, 1996. 61 Federal Register 41006 (1996).
- [4] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Second Memorandum Opinion and Order, ET Docket 93-62, adopted August 25, 1997.
- [5] *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields*, OET Bulletin 65, August, 1997.



EM-AT&T-070-020604
131 Little City Road
Killingworth 6/11/02

RECEIVED

JUN - 4 2002

**NOTICE OF INTENT TO MODIFY AN
EXISTING TELECOMMUNICATIONS FACILITY AT
131 LITTLE CITY ROAD, KILLINGWORTH, CONNECTICUT**

**CONNECTICUT
SITING COUNCIL**

Pursuant to the Public Utility Environmental Standards Act, Connecticut General Statutes § 16-50g et. seq. ("PUESA"), and Sections 16-50j-72(b) of the Regulations of Connecticut State Agencies adopted pursuant to the PUESA, AT&T Wireless PCS, LLC d/b/a AT&T Wireless ("AT&T Wireless") hereby notifies the Connecticut Siting Council of its intent to modify an existing facility located at 131 Little City Road, Killingworth, Connecticut (the "Little City Road Facility"), owned by American Tower Corporation ("American Tower"). AT&T Wireless and American Tower have agreed to share the use of the Little City Road Facility, as detailed below.

The Little City Road Facility

The Little City Road Facility consists of an approximately three hundred two (302) foot lattice tower (the "Tower") and associated equipment currently being used for wireless communications use by Nextel. A chain link fence surrounds the Tower compound. The current surrounding land uses include rural residential and undeveloped property.

AT&T Wireless' Facility

As shown on the enclosed plans prepared by Tectonic/Keyes Associates, including a site plan and tower elevation of the Little City Road Facility, AT&T Wireless proposes shared use of the Facility by placing antennas on the Tower and equipment cabinets needed to provide personal communications services ("PCS") within an existing communications building at the tower site. AT&T Wireless will install 6 panel antennas at approximately the 140 foot level of the Tower and associated equipment cabinets within the existing equipment building. As evidenced in the structural report prepared by Communication Structures Engineering, Inc., annexed hereto as Exhibit A, AT&T has confirmed that the tower is structurally capable of supporting the addition of AT&T Wireless' antennas.

AT&T Wireless' Facility Constitutes An Exempt Modification

The proposed addition of AT&T Wireless' antennas and equipment to the Little City Road Facility constitutes an exempt "modification" of an existing facility as defined in Connecticut General Statutes Section 16-50i(d) and Council regulations promulgated pursuant thereto. Addition of AT&T Wireless' antennas and equipment to the Tower will not result in an increase of the Tower's height nor extend the site boundaries. Further, there will be no increase in noise levels by six (6) decibels or more at the Tower site's boundary. As set forth in an Emissions Report prepared by Nader Soliman, Radio Frequency Engineer, annexed hereto as Exhibit B, the total radio frequency electromagnetic radiation power density at the Tower site's boundary will not

be increased to or above the standard adopted by the Connecticut Department of Environmental Protection as set forth in Section 22a-162 of the Connecticut General Statutes and MPE limits established by the Federal Communications Commission (Note: AT&T's Microwave Horn's were excluded from the analysis because they are a redundant backup system that is not currently operational). For all the foregoing reasons, addition of AT&T Wireless' facility to the Tower constitutes an exempt modification which will not have a substantially adverse environmental effect.

Conclusion

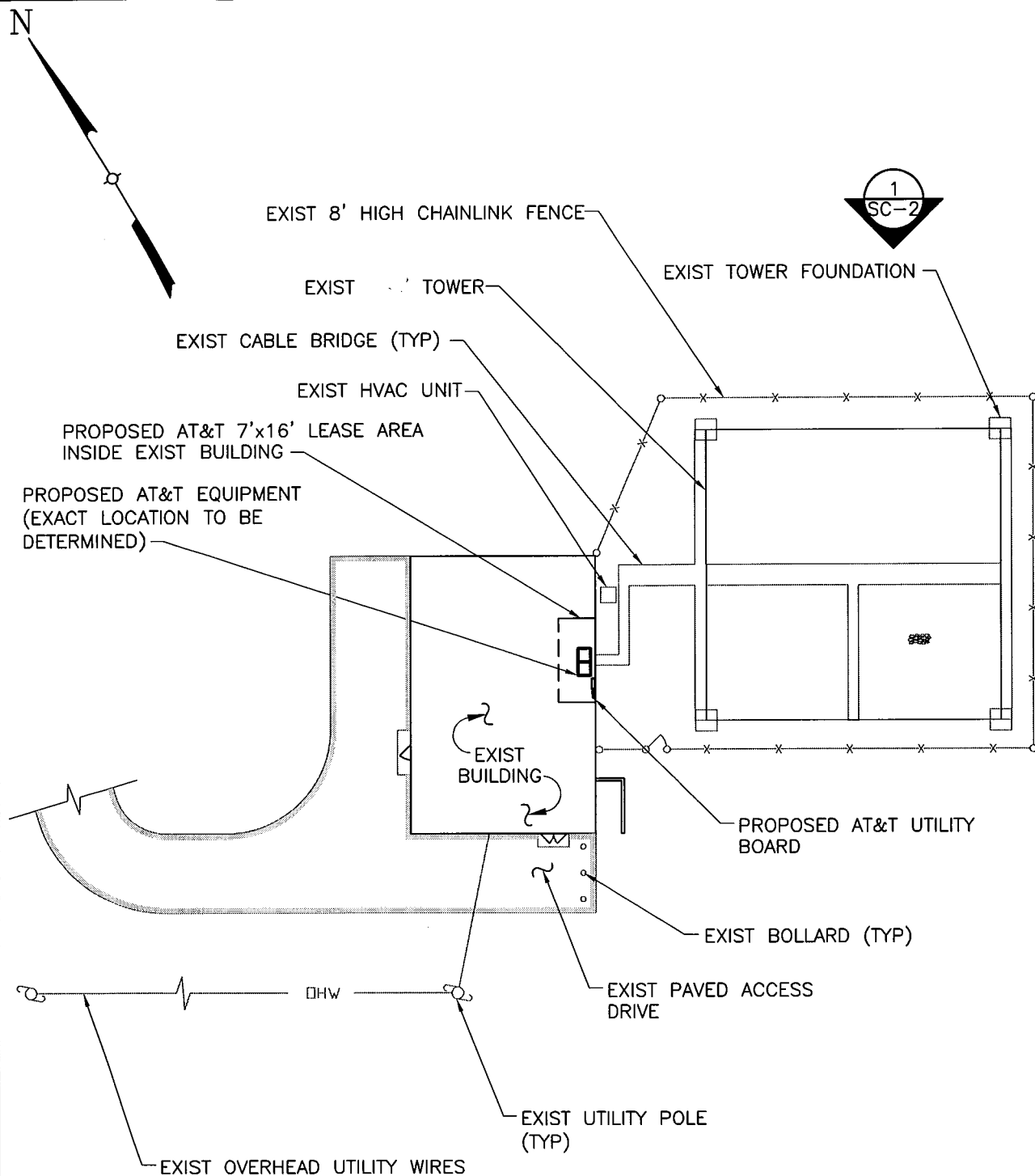
Accordingly, AT&T Wireless requests that the Connecticut Siting Council acknowledge that its proposed modification to the Little City Road Facility meets the Council's exemption criteria.

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read 'C.B. Fisher', is written over the typed name.

Christopher B. Fisher, Esq.
On behalf of AT&T Wireless

cc: First Selectman, Town of Killingworth
Joanne Desjardins, Pinnacle



TECTONIC/KEYES ASSOCIATES
 1344 BLAIR DEANE HIGHWAY, SUITE 900
 ROCKY HILL, CT 06067-1344
 OFFICE: (860)563-2341
 FAX: (860)567-4882



AT&T

AT&T WIRELESS SERVICES, INC.
 12 Omega Drive, Second Floor
 Stamford, Connecticut 06902

DRAWING TITLE:
SITE DETAIL PLAN
 PROJECT INFORMATION:
KILLINGWORTH
CT-848
131 LITTLE CITY ROAD
KILLINGWORTH, CT 06419
 PROPERTY OWNER:
AMERICAN TOWERS CORP
562 CAPTAIN NEVILLE DRIVE
WATERBURY, CT 06705

DRAWING NO.
SC-1

REVISION NO. 1	DRAWN BY: WRB
DATE: 5/29/02	CHECKED BY: MC
SCALE: 1"=20'	APPROVED BY: JDF
ISSUED FOR APPROVAL	SHEET NO. 1 of 2
WORK ORDER #: 3133.CT848	

302.5'± AGL
(T/EXIST TOWER)

NOTE:
THE HEIGHT OF EXIST TOWER &
ANTENNAS PROVIDED BY AMERICAN
TOWER

EXIST
TOWER

PROPOSED AT&T
SECTOR ANTENNA (TYP)

PROPOSED AT&T
ANTENNA CABLES

EXIST CABLE BRIDGE

EXIST 8' CHAINLINK FENCE

PROPOSED AT&T
EQUIPMENT INSIDE
EXIST BUILDING

EXIST BUILDING

EXIST GRADE

253'± AGL
(C EXIST NEXTEL ANTENNAS)

185'± AGL

140'± AGL

(C PROPOSED AT&T ANTENNAS)

EXIST TOWER FOUNDATION

TECTONIC/KEYES ASSOCIATES
1344 BELAS DEANE HIGHWAY, SUITE 800 OFFICE: (860)863-3341
ROCKY HILL, CT 06067-1346 FAX: (860)867-4882



AT&T

AT&T WIRELESS SERVICES, INC.
12 Omega Drive, Second Floor
Stamford, Connecticut 06902

DRAWING TITLE:
ELEVATION
PROJECT INFORMATION:
KILLINGWORTH
CT-848

131 LITTLE CITY ROAD
KILLINGWORTH, CT 06419
PROPERTY OWNER:
AMERICAN TOWERS CORP
562 CAPTAIN NEVILLE DRIVE
WATERBURY, CT 06705

DRAWING NO.

SC-2

REVISION NO. 1	DRAWN BY: WRB
DATE: 5/29/02	CHECKED BY: MC
SCALE: 1"=30'	APPROVED BY: JDF
ISSUED FOR APPROVAL	SHEET NO. 2 of 2
WORK ORDER #: 3133.CT848	



Mr. Steve Schamberg
American Tower Corporation
10 Presidential Way
Woburn, MA 01801

May 20, 2002

Re: Structural Review of ATC's Killingworth, CT Lattice Tower
American Tower Site No: 88013, Middlesex County, CT
Located: Little City Road in Killingworth, CT
Latitude N 41° 25' 43", Longitude W 72° 36' 14"

Dear Mr. Schamberg,

Communication Structures Engineering, Inc. (CSEI) has completed a structural review of the existing 302.5-ft Modified Type 'A D/D' tower located at this American Tower Corporation (ATC) site known as Killingworth, CT. In accordance with ATC's request, we performed a structural analysis of this tower to check its capability to support the existing tower, antenna and equipment loads as well as the new loads from the AT&T Wireless Services (ATTWS) proposed antenna and transmission line additions. The specific loading criteria that we utilized were those prescribed by the national standard "ANSI/TIA/EIA-222-F-1996", "Structural Standards for Steel Antenna Towers and Antenna Supporting Structures." In accordance with this Standard the "basic wind speed" that we utilized for the analysis of this structure was the "fastest-mile velocity" of 85-mph specified for Middlesex County, CT. A description of the existing tower, the applicable design criteria, the structural analysis procedure, and a description of the results of CSEI's structural analysis follows.

EXISTING TOWER INFORMATION & HISTORY

The 302.5-ft Modified Type 'A D/D' tower at this site was originally built in 1967 for AT&T to support two KS15676 horn antennas on the standard antenna platform at 302.5-ft AGL and two KS15676 horn antennas on special corner antenna platform at 187-5-ft AGL. In 1998 CSEI added the existing mounts for Nextel's six panel antennas. American Tower Corporation acquired this tower from AT&T (Corporate) in 2000.

CSEI utilized the original 1967 tower design, fabrication & foundation drawings as well as later tower modification drawings to conduct our structural review of this tower. CSEI's drawings for the existing Nextel installation were used to calculate their antenna & cable loads. The tower inventory list, which was provided by ATC, was used to determine the proposed AT&T Wireless Services antenna & cable requirements. Recent photos provided by ATC were used to confirm the existing antenna arrangement.

DESIGN CRITERIA

See the attached page for the applicable Design Criteria and Antenna Configuration that were used for this structural analysis.

STRUCTURAL ANALYSIS PROCEDURE

The referenced design criteria combined with wind tunnel test data from tests conducted on AT&T towers, antennas and antenna platforms were utilized to determine the applicable loads for this structure. A frame analysis was performed utilizing the stated wind loads and a computer model of the tower framing modeled on STAAD III software. The load carrying frame members of this structure were then reviewed to check their compliance with the AISC 1989 ASD "Specification for Structural Steel Buildings".

RESULTS OF STRUCTURAL ANALYSIS

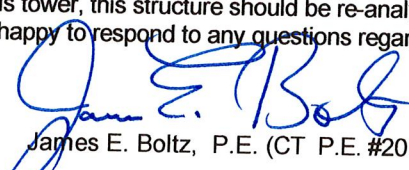
All of the existing tower members had maximum stress levels that were less than the allowable stresses permitted by the AISC Specification. We have therefore concluded that this existing tower is capable of supporting the existing loads as well as the proposed ATTWS additions in compliance with "ANSI/TIA/EIA-222-F" design criteria. This tower will not require any structural modifications or changes to support the stated equipment provided that the following conditions are satisfied:

If these conditions are not upheld, the results of our structural analysis will be invalid.

- 1.) The twelve new ATTWS coaxial cables are **not** to be installed on the same tower face as the existing Nextel coaxial cables
- 2.) The twelve new ATTWS 1-1/4" diameter coaxial cables are to be stacked in two rows, with one row directly behind the other, so that a maximum of six coaxial cables are exposed and six coaxial cables are shielded from wind loading.
- 3.) The new ATTWS antenna & cable mounts are to be properly engineered & installed by the firms responsible for that work scope.

If any co-location customers add any future additional antennas or equipment to this tower, this structure should be re-analyzed at that time.
CSEI would be happy to respond to any questions regarding this structural analysis.

Sincerely,


James E. Boltz, P.E. (CT P.E. #20122)

attachment: Design Criteria for Killingworth, CT





RF Exposure Analysis for Proposed AT&T Wireless Antenna Facility

SITE ID: 907-007-848

May 29, 2002

Prepared by AT&T Wireless Services, Inc.
Nader Soliman **RF Engineer**

Table of Contents

1. INTRODUCTION3

2. SITE DATA.....3

3. RF EXPOSURE PREDICTION3

4. FCC GUIDELINES FOR EVALUATING THE ENVIRONMENTAL EFFECTS OF RF RADIATION
4

5. COMPARISON WITH STANDARDS4

6. CONCLUSION4

7. FCC LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE5

8. EXHIBIT A6

9. FOR FURTHER INFORMATION.....7

10. REFERENCES7

1. Introduction

This report constitutes an RF exposure analysis for the proposed AT&T Wireless antenna facility to be located at 131 Little City Road, Killingworth, CT. This analysis uses site-specific engineering data to determine the predicted levels of radio frequency (RF) electromagnetic energy in the vicinity of the proposed facility and compares those levels with the Maximum Permissible Exposure (MPE) limits established by the Federal Communications Commission.

2. Site Data

Site Name: Partridge Hallow	
Number of simultaneously operating channels	16
Type of antenna	Allgon 7250.03
Power per channel (Watts ERP)	250.0 Watts
Height of antenna (feet AGL)	140.00 feet
Antenna Aperture Length	5 feet

3. RF Exposure Prediction

The following equations established by the FCC, in conjunction with the site data, were used to determine the levels of RF electromagnetic energy present in the vicinity of the proposed facility¹:

$$PowerDensity = \frac{0.64 * N * EIRP(\theta)}{\pi * R^2} (mW/cm^2) \quad Eq. 1-Far-field$$

Where, N = Number of channels, R = distance in cm from the RC (Radiation Center) of antenna, and $EIRP(\theta)$ = The isotropic power expressed in milliwatts in the direction of prediction point. This is the correct equation for antennas which have their gain expressed in dBi, which is the usual case for the PCS bands.

$$PowerDensity = \frac{P_{in} / ch * N * 10^3}{2 * \pi * R * h * \alpha / 360} (mW/cm^2) \quad Eq. 2-Near-field$$

Where P_{in}/ch = Input power to antenna terminals in watts/ch, R = distance to center of radiation, h = aperture height in meters, α = 3 dB beam-width of horizontal pattern.

¹ RF exposure is measured and predicted in terms of power density in units of milliwatts (mW), a thousandth of a watt, or microwatts (μ W), a millionth of a watt, per square centimeter (cm^2). Data comparing predictive analysis with on site measurements has demonstrated that power density can be effectively predicted at given locations in the vicinity of a wireless antenna facility.

4. FCC Guidelines for Evaluating the Environmental Effects of RF Radiation

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by a Second Memorandum Opinion and Order. These new rules represent a consensus of the federal agencies responsible for the protection of public health and the environment, including the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the National Institute for Occupational Health and Safety (NIOSH), and the Occupational Safety and Health Administration (OSHA).

Under the laws that govern the delivery of wireless communications services in the United States, as amended by the Telecommunications Act of 1996, the FCC has exclusive jurisdiction over RF emissions from personal wireless antenna facilities, which include cellular, PCS, messaging and aviation sites.² Pursuant to its authority under federal law, the FCC has established rules to regulate the safety of emissions from these facilities.

5. Comparison with Standards

Exhibit A shows the levels of RF electromagnetic energy as one moves away from the antenna facility. As shown in Exhibit A, the maximum power density is 0.000509 mW/cm² which occurs at 1800 feet from the antenna facility. The chart in exhibit A also shows that the power density is only 0.000100 mW/cm² at a distance of 4 feet. Table 1 below shows the Maximum Permissible Exposure (MPE) limits established by the FCC. There are different MPE limits for public/uncontrolled and occupational/controlled environments.

Table 1: Maximum Permissible Exposure limits for RF radiation

<i>Frequency</i>	<i>Public/Uncontrolled</i>	<i>Occupational/controlled</i>	<i>Maximum power density at Accessible location</i>
Cellular	.580 mW/cm ²	2.9 mW/cm ²	0.000509 mW/cm ²
PCS	1 mW/cm ²	5 mW/cm ²	

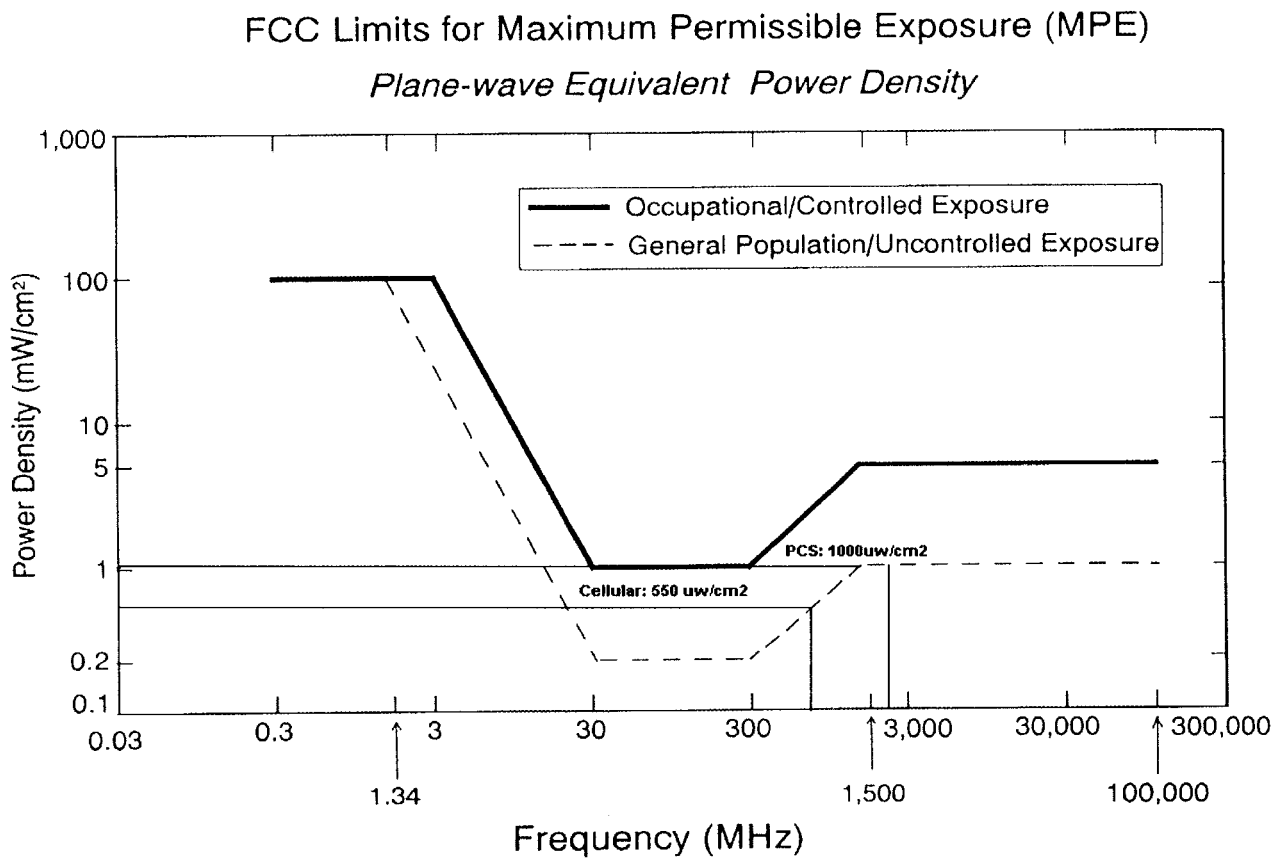
The maximum power density at the proposed facility represents only 0.06% of the public MPE limit for PCS frequencies.

6. Conclusion

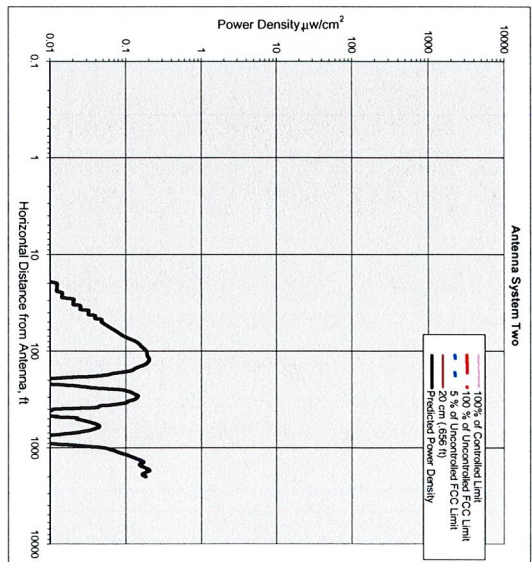
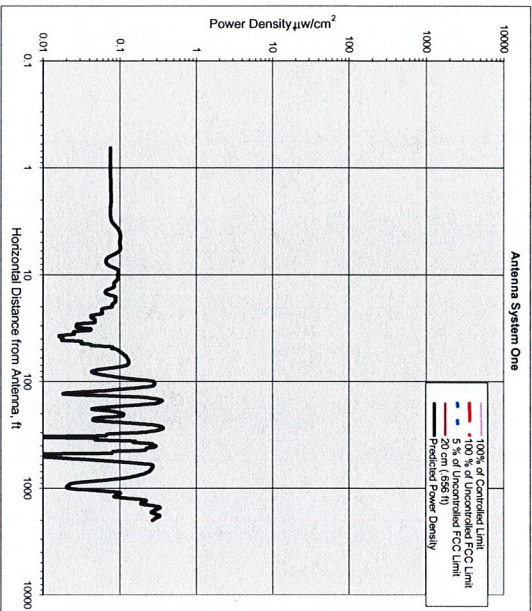
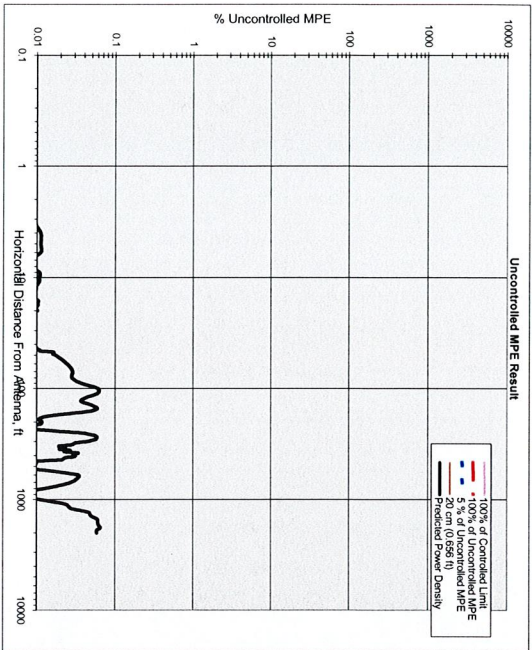
This analysis show that the maximum power density in accessible areas at this location is 0.005090 mW/cm², a level of RF energy that is well below the Maximum Permissible Exposure limit established by the FCC.

² 47 U.S. C. Section 332 (c) (7)(B)(iv) states that “[n]o State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission’s regulations concerning such emissions.”

7. FCC Limits for Maximum Permissible Exposure



8. Exhibit A



Number of Antenna Systems: 2

Meets FCC Controlled Limits for The Antennas Systems.

Meets FCC Uncontrolled Limits for The Antenna Systems.

Meets 5% of FCC Uncontrolled Limits for The Antenna Systems.

No Further Maximum Permissible Exposure (MPE) Analysis Required.

	Power Density mW/cm ²	% of limit	@Horiz. Dist. feet
Maximum Power Density =	0.000509	0.06	1800.00
1.545/47 times lower than the MPE limit for uncontrolled environment			
Composite Power (ERP) =	17,200.00	Watts	

Performed By: Nader Soliman

Site ID: 907-007-848

Site Name: Partridge Hollow

Site Location: 131 Little City Road

Killingworth, CT

Date: 5/29/02

Antenna System One

	units	Value
Frequency	MHz	1945.00
# of Channels	#	16
Max ERP/Ch	Watts	250.00
Max Pwr/Ch into Ant.	Watts	5.86
(Center of Radiator)	feet	140.00
Calculation Point	feet	0.00
(above ground or		0.00
roof surface)		0.00
Antenna Model No.		Aligon 7250.03
Max Ant Gain	dBd	16.30
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	5.11
Ant HBW	degrees	65.00
Distance to Antenna	feet	137.45
WOST?	Y/N?	n

Ant System ONE Owner: AT&T

Sector: 3

Azimuth: 60/180/280

Antenna System Two

	units	Value
Frequency	MHz	851.00
# of Channels	#	16
Max ERP/Ch	Watts	250.00
Max Pwr/Ch into Ant.	Watts	18.53
(Center of Radiator)	feet	253.00
Calculation Point	feet	0.00
(above ground or		0.00
roof surface)		0.00
Antenna Model No.		ALP9011
Max Ant Gain	dBd	11.30
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	4.00
Ant HBW	degrees	95.00
Distance to Antenna	feet	251.00
WOST?	Y/N?	n

Ant System TWO Owner: Nexcel

Sector: 3

Azimuth: 0/120/140

9. For Further Information

Additional information about the environmental impact of RF energy from personal wireless antenna facilities can be obtained from the Federal Communications Commission:

Dr. Robert Cleveland
Federal Communications Commission
Office of Engineering and Technology
Washington, DC 20554

RF Safety Program: 202-418-2464
Internet address: rfsafety@fcc.gov
RF Safety Web Site: www.fcc.gov/oet/rfsafety

10. References

- [1] The Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 U.S.C. Section 332 (c)(7)(B)(iv).
- [2] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Notice of Proposed Rulemaking, ET Docket 93-62, 8 FCC Rcd 2849 (1993).
- [3] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Report and Order, ET Docket 93-62, FCC 96-326, adopted August 1, 1996. 61 Federal Register 41006 (1996).
- [4] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Second Memorandum Opinion and Order, ET Docket 93-62, adopted August 25, 1997.
- [5] *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields*, OET Bulletin 65, August, 1997.



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@po.state.ct.us

Web Site: www.state.ct.us/csc/index.htm

June 5, 2002

Via Facsimile

Mr. Christopher B. Fisher, Esq.
Cuddy & Feder & Worby
90 Maple Avenue
White Plains, NY 10601-5196

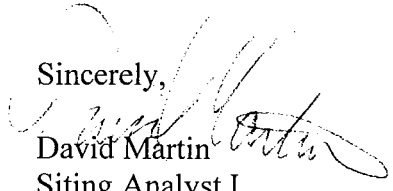
RE: **EM-AT&T-070-020604** - AT&T Wireless PCS, LLC d/b/a AT&T Wireless
notice of intent to modify an existing telecommunications facility located at 131
Little City Road, Killingworth, CT.

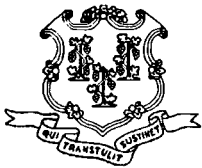
Dear Atty. Fisher:

In the RF Analysis for this facility, the composite power is given as 17,200 watts. However, the total composite power for the two antenna systems identified seems to equal 8,000 watts. Are there antenna systems on this tower that haven't been identified by the RF engineer? If so, are their emissions included in the RF calculations?

Thank you for your assistance in this matter.

Sincerely,


David Martin
Siting Analyst I



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: siting.council@po.state.ct.us

Web Site: www.state.ct.us/csc/index.htm

June 6, 2002

Honorable David L. Denvir
First Selectman
Town of Killingworth
Town Office Building
323 Route 81
Killingworth, CT 06419-1298

RE: **EM-AT&T-070-020604** - AT&T Wireless notice of intent to modify an existing telecommunications facility located at 131 Little City Road, Killingworth, Connecticut.

Dear Mr. Denvir:

The Connecticut Siting Council (Council) received this request to modify an existing telecommunications facility, pursuant to Regulations of Connecticut State Agencies Section 16-50j-72.

The Council will consider this item at the next meeting scheduled for June 25, 2002, at 1:30 p.m. in Hearing Room One, Ten Franklin Square, New Britain, Connecticut.

Please call me or inform the Council if you have any questions or comments regarding this proposal.

Thank you for your cooperation and consideration.

Very truly yours,

S. Derek Phelps
Executive Director

SDP/dsj

Enclosure: Notice of Intent

c: Cathie Jefferson, Zoning Enforcement Officer, Town of Killingworth

CUDDY & FEDER & WORBY LLP

90 MAPLE AVENUE
WHITE PLAINS, NEW YORK 10601-5196

CUDDY & FEDER
1971-1995

NEL ALEXANDER (also CT)
CHARLES T. BAZZANO (also NJ)
THOMAS R. BERNER (also NJ)
THOMAS M. BLOOMER
JOSEPH P. CARLSON
KENNETH J. DUMROU
RODOLFO FEDER
CHRISTOPHER B. FISHER (also CT)
ANTHONY B. GOTTRELL (also CT)
SUSAN E. H. GORDON
KAREN G. GRAMER
JOSHUA I. GRAUER
WAYNE P. HALLER (also CT)
KIMBERLY E. JONES
MICHAEL L. KATZ (also NJ)
JOSHUA E. KIMBERLING (also CT)
DANIEL E. LARRY (also CT)
BARRY T. LONG

(914) 761-1300
TELECOPIER (914) 761-5372/6405

500 HIGHT AVENUE
NEW YORK, NEW YORK 10101
(212) 944-2841
TELECOPIER (212) 944-2843

WESTAGE BUSINESS CENTER
300 SOUTH LAKE DRIVE
FISHKILL, NEW YORK 12524
(845) 896-2229
TELECOPIER (845) 896-3672

STAMFORD, CONNECTICUT
NORWALK, CONNECTICUT

WILLIAMS NULI
DAWN M. PORTNEY
ELISABETH N. RADOW
NICHOL RIMSKY
RUTH J. ROTH
JENNIFER L. VAN TUYL
CHAUNCEY L. WALKER (also CA)
ROBERT L. WOLFE
DAVID E. WORBY

Of Counsel
MICHAEL R. LIDELMAN
ANDREW A. GLICKSON (also CT)
ROBERT L. OSAR (also TX)
MARYANN PALERMO
ROBERT C. SCHMIDT
LOUIS R. TALLERA

RECEIVED
JUN 11 2002
CONNECTICUT
SITING COUNCIL

TO: David Martin, Connecticut Siting Council
FROM: Christopher B. Fisher, Esq.
MAIN OFFICE NO. 860-827-2935
TELECOPIER NO. 860-827-2950
DATE: 6/11/02 PAGES: 19 CLIENT 1844 MATTER: 708
MESSAGE: (Including Cover)

IMPORTANT NOTICE: The accompanying fax transmission is intended to be viewed and read only by the individual or entity named above. If you are not the intended recipient so named, you are prohibited from reading this transmission. You are also notified that any dissemination, distribution or copying of this transmission is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original transmission to us by the U.S. Postal Service. Thank you.

OPERATOR: Barb Jagers (914) 761-1300 Ext. 256
IF THERE ARE ANY PROBLEMS, PLEASE NOTIFY OPERATOR IMMEDIATELY

CUDDY & FEDER & WORBY LLP

90 MAPLE AVENUE
WHITE PLAINS, NEW YORK 10601-5196

(914) 761-1300

TELECOPIER (914) 761-5372/6405

www.cfwlaw.com

500 FIFTH AVENUE
NEW YORK, NEW YORK 10110
(212) 844-2841
TELECOPIER (212) 844-2843

WESTAGE BUSINESS CENTER
300 SOUTH LAKE DRIVE
FISHKILL, NEW YORK 12524
(845) 896-2229
TELECOPIER (845) 896-3672

STAMFORD, CONNECTICUT
NORWALK, CONNECTICUT

CUDDY & FEDER
1871-1895

PHILIP A. CUDDY (New CT)
CHRISTOPHER B. FEDER (New CT)
THOMAS R. WORBY (New CT)
THOMAS R. WORBY (New CT)
JOSEPH P. CUDDY (New CT)
ROBERT L. WORBY (New CT)
BRADLEY L. CUDDY
CHRISTOPHER B. FEDER (New CT)
ANDREW A. CUDDY (New CT)
MICHAEL R. CUDDY (New CT)
KATHLEEN G. CUDDY
JENNIFER L. CUDDY
WILLIAM S. CUDDY (New CT)
MICHAEL R. CUDDY
MICHAEL R. CUDDY (New CT)
MICHAEL R. CUDDY (New CT)
MICHAEL R. CUDDY (New CT)
MICHAEL R. CUDDY (New CT)
MICHAEL R. CUDDY (New CT)

WILLIAM S. CUDDY
DAWN M. FORTNEY
ELIZABETH R. BACAW
NEIL T. RIMSKY
RUTH E. BOTT
JENNIFER L. VAN TUYL
CLAUDY L. WALKER (New CA)
ROBERT L. WORBY
DAVID E. WORBY

OF COUNSEL
MICHAEL R. CUDDY
ANDREW A. CUDDY (New CT)
ROBERT L. CUDDY (New CT)
MARYANN M. PALTOMO
ROBERT C. CUDDY
LOUIS R. TARTAGLIA

June 11, 2002

VIA FACSIMILE (860) 827-2950

AND FEDERAL EXPRESS

David Martin

Siting Analyst

Connecticut Siting Council

10 Franklin Square

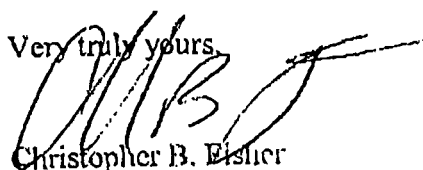
New Britain, Connecticut 06051

Re: BM-AT&T-092-020530 New Hartford
BM-AT&T-070-020604 Killingworth
BM-AT&T- Tolland

Dear Mr. Martin:

On behalf of AT&T Wireless, enclosed please find revised RF Exposure Reports for the above referenced facilities in New Hartford and Killingworth to address your correspondence. With respect to AT&T's recent filings, the worst case number of channels used in the analyses has been revised to 12 versus 16 based on information recently provided by Nokia which manufactures the equipment. With respect to the Tolland facility, it is our understanding that the MPE report accurately reflects existing transmission antennas on the tower and the drawings are being revised accordingly. We hope to submit those drawings shortly as either a supplement to our submission or a post-acknowledgment filing. Should you or the Council have any questions or require any additional information, please do not hesitate to contact us.

Very truly yours,


Christopher B. Eisher



RF Exposure Analysis for Proposed AT&T Wireless Antenna Facility

SITE ID: 913-008-673

June 04, 2002

**Prepared by AT&T Wireless Services, Inc.
Prabhakar K. Rughoobur, RF Engineer**

Table of Contents

1. INTRODUCTION	3
2. SITE DATA	3
3. RF EXPOSURE PREDICTION	3
4. FCC GUIDELINES FOR EVALUATING THE ENVIRONMENTAL EFFECTS OF RF RADIATION 4	
5. COMPARISON WITH STANDARDS.....	4
6. CONCLUSION.....	4
7. FCC LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE	5
8. EXHIBIT A.....	6
9. FOR FURTHER INFORMATION.....	7
10. REFERENCES.....	7

1. Introduction

This report constitutes an RF exposure analysis for the proposed AT&T Wireless antenna facility to be located at 130 Industrial Park Access Rd, New Hartford CT. This analysis uses site-specific engineering data to determine the predicted levels of radio frequency (RF) electromagnetic energy in the vicinity of the proposed facility and compares those levels with the Maximum Permissible Exposure (MPE) limits established by the Federal Communications Commission.

2. Site Data

Site Name: <i>New Hartford East</i>	
Number of simultaneously operating channels	12
Type of antenna	Allgon 7250.03
Power per channel (Watts EIRP)	250.0 Watts
Height of antenna (feet AGL)	137.00 feet
Antenna Aperture Length	5 feet

3. RF Exposure Prediction

The following equations established by the FCC, in conjunction with the site data, were used to determine the levels of RF electromagnetic energy present in the vicinity of the proposed facility¹:

$$\text{PowerDensity} = \frac{0.64 * N * EIRP(\theta)}{\pi * R^2} \text{ (mW/cm}^2\text{)} \quad \text{Eq. 1-Far-field}$$

Where, N = Number of channels, R = distance in cm from the RC (Radiation Center) of antenna, and $EIRP(\theta)$ = The isotropic power expressed in milliwatts in the direction of prediction point. This is the correct equation for antennas which have their gain expressed in dBi, which is the usual case for the PCS bands.

$$\text{PowerDensity} = \frac{P_{in}/ch * N * 10^3}{2 * \pi * R * h * \alpha / 360} \text{ (mW/cm}^2\text{)} \quad \text{Eq. 2-Near-field}$$

Where P_{in}/ch = Input power to antenna terminals in watts/ch, R = distance to center of radiation, h = aperture height in meters, α = 3 dB beam-width of horizontal pattern.

¹ RF exposure is measured and predicted in terms of power density in units of milliwatts (mW), a thousandth of a watt, or microwatts (μ W), a millionth of a watt, per square centimeter (cm^2). Data comparing predictive analysis with on site measurements has demonstrated that power density can be effectively predicted at given locations in the vicinity of a wireless antenna facility.

4. FCC Guidelines for Evaluating the Environmental Effects of RF Radiation

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by a Second Memorandum Opinion and Order. These new rules represent a consensus of the federal agencies responsible for the protection of public health and the environment, including the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the National Institute for Occupational Health and Safety (NIOSH), and the Occupational Safety and Health Administration (OSHA).

Under the laws that govern the delivery of wireless communications services in the United States, as amended by the Telecommunications Act of 1996, the FCC has exclusive jurisdiction over RF emissions from personal wireless antenna facilities, which include cellular, PCS, messaging and aviation sites.² Pursuant to its authority under federal law, the FCC has established rules to regulate the safety of emissions from these facilities.

5. Comparison with Standards

Exhibit A shows the levels of RF electromagnetic energy as one moves away from the antenna facility. As shown in Exhibit A, the maximum power density is 0.001503 mW/cm² which occurs at 260 feet from the antenna facility. The chart in exhibit A also shows that the power density is only 0.000200 mW/cm² at a distance of 4 feet. Table 1 below shows the Maximum Permissible Exposure (MPE) limits established by the FCC. There are different MPE limits for public/uncontrolled and occupational/controlled environments.

Table 1: Maximum Permissible Exposure limits for RF radiation

Frequency	Public/Uncontrolled	Occupational/controlled	Maximum power density at Accessible location
Cellular	.580 mW/cm ²	2.9 mW/cm ²	0.001503 mW/cm ²
PCS	1 mW/cm ²	5 mW/cm ²	

The maximum power density at the proposed facility represents only 0.24% of the public MPE limit for PCS frequencies.

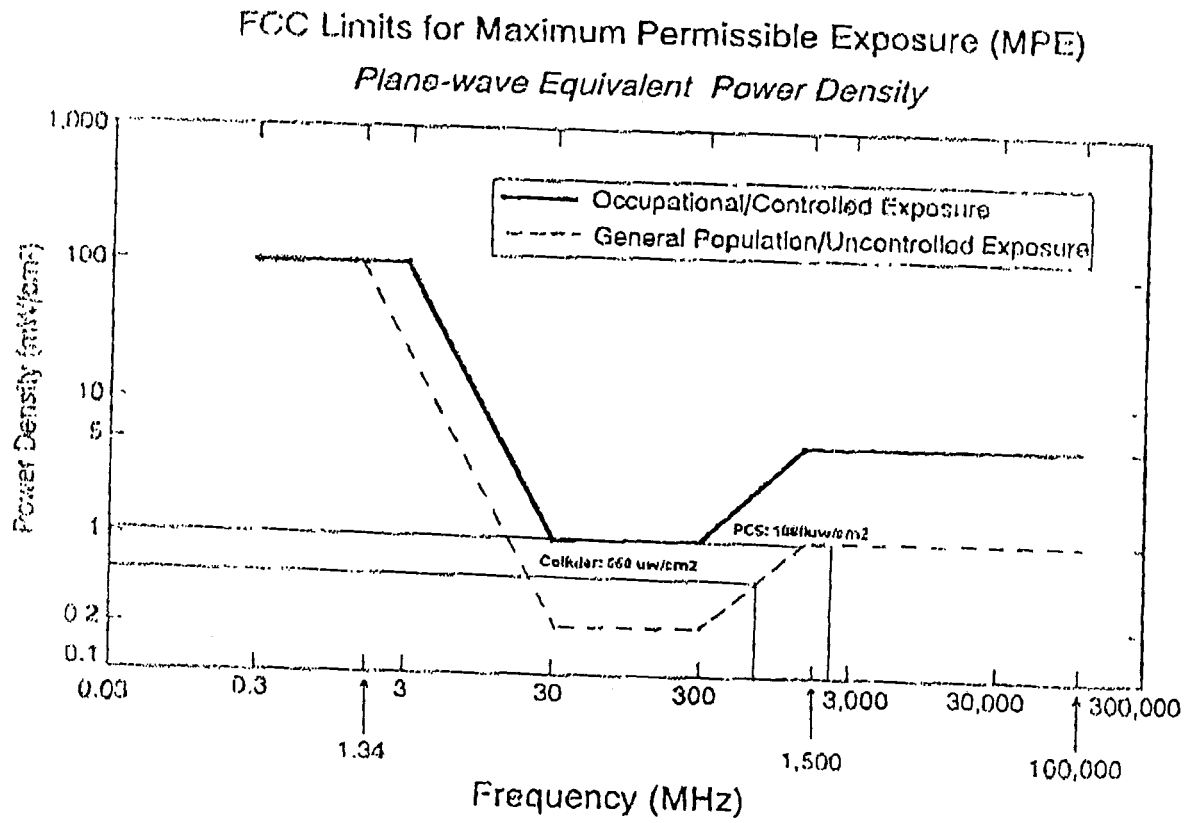
6. Conclusion

This analysis show that the maximum power density in accessible areas at this location is 0.001503 mW/cm², a level of RF energy that is well below the Maximum Permissible Exposure limit established by the FCC.

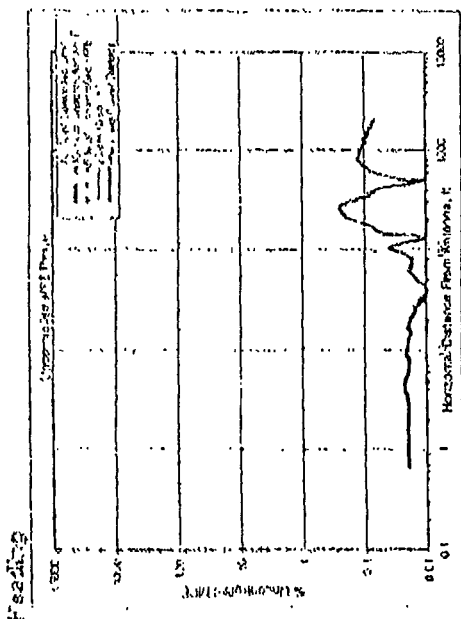
² 47 U.S.C. Section 332 (c)(7)(B)(iv) states that "[n]o State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."

AT&T Wireless Services, Inc.

7. FCC Limits for Maximum Permissible Exposure



8. Exhibit A



Number of Antenna Systems: 3

United FCC (Incorporated Ltd), for the American Systems

Waxes 5% of FCC Uncontrolled Limits for The Airborne System

to further maximize exposure (MPE) Analysis Required.

	Power Out.: 1	Power Div.
Useful Power Density =	n W/cm ²	% of Prob
417 dB less than the MPE for uncoated antenna	0.001563	0.24
Maximum Power(EIRP) =	9000 mW	

Propulsion & Rudder

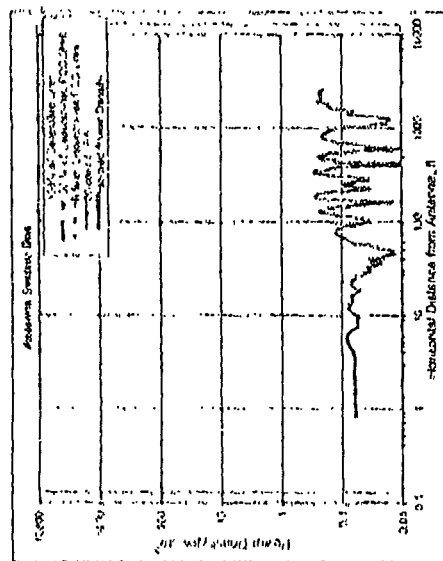
Section 2

ආදායම: රු. 1,000,000.00

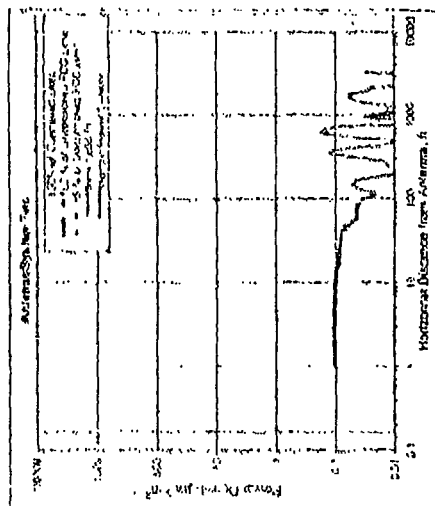
And Systems That Don't: Secret!

Sector: 3

Asignatura: D'123270

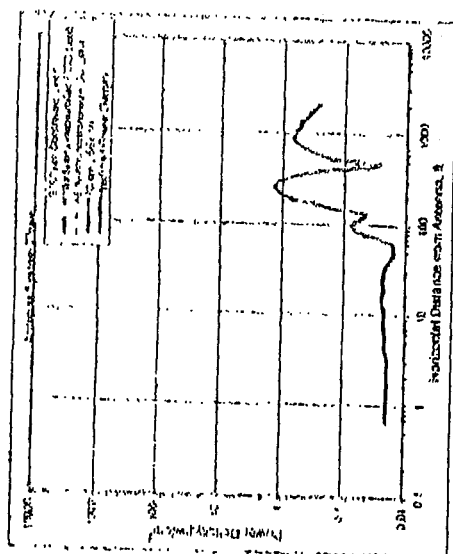


Uniform System On

[illegible]

Antenna System Two

Pre-treatment	Unit	Value
# of Channels	#	12
Max EPRD	Watts	750.00
Via Power Into Air	Volts	7.73
Channel Budget	Hz	457.63
Calibration Port	Hz	0.00
(define ground or not)		0.00
not a model		0.00
Antenna Model		DR325G59
Max Ant Gain	dBi	15.40
Down In	degrees	0.30
Max Ant Gain	dBi	0.00
Max of a channel	dB	0.00
Ant SWR	loss	0.00
Down to Antenna	net	154.50
WDSI	W	0



Airline System Three

Frequency	MHz	Units	Value
# of Channels	4		50000
Max ERP/Ch	Watts		12
Max Power to All	Watts		290.00
Center of Radiation	feet		13.41
Calculation Point	feet		141.20
Above ground or	feet		0.00
sea level	feet		0.00
Airline Model No.			0864-H915-NY
Max Ant Gain	dBi		12.70
Downward	degrees		0.00
Horizontal Az	degrees		0.00
Height of Antenna	feet		4.00
Ant N/A	degrees		0.00
Distance to Antenna	feet		145.14
WCS	ft		0

Air System Three Owner: Verizon
 Station: 3
 Airtech: 0120240

AT&T Wireless Services, Inc.

9. For Further Information

Additional information about the environmental impact of RF energy from personal wireless antenna facilities can be obtained from the Federal Communications Commission:

Dr. Robert Cleveland
Federal Communications Commission
Office of Engineering and Technology
Washington, DC 20554

RF Safety Program: 202-418-2464
Internet address: rfafety@fcc.gov
RF Safety Web Site: www.fcc.gov/oet/rfsafety

10. References

- [1] The Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 U.S.C. Section 332 (c)(7)(B)(iv).
- [2] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Notice of Proposed Rulemaking, ET Docket 93-62, 8 FCC Rcd 2849 (1993).
- [3] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Report and Order, ET Docket 93-62, FCC 96-326, adopted August 1, 1996, 61 Federal Register 41006 (1996).
- [4] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Second Memorandum Opinion and Order, ET Docket 93-62, adopted August 25, 1997.
- [5] *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields*, OET Bulletin 65, August, 1997.



**RF Exposure Analysis for Proposed
AT&T Wireless Antenna Facility**

SITE ID: 907-007-848

June 7, 2002

**Prepared by AT&T Wireless Services, Inc.
Nader Soliman RF Engineer**

Table of Contents

1. INTRODUCTION.....	3
2. SITE DATA.....	3
3. RF EXPOSURE PREDICTION.....	3
4. FCC GUIDELINES FOR EVALUATING THE ENVIRONMENTAL EFFECTS OF RF RADIATION 4	4
5. COMPARISON WITH STANDARDS.....	4
6. CONCLUSION.....	4
7. FCC LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE.....	5
8. EXHIBIT A.....	6
9. FOR FURTHER INFORMATION.....	7
10. REFERENCES.....	7

1. Introduction

This report constitutes an RF exposure analysis for the proposed AT&T Wireless antenna facility to be located at 131 Little City Road, Killingworth, CT. This analysis uses site-specific engineering data to determine the predicted levels of radio frequency (RF) electromagnetic energy in the vicinity of the proposed facility and compares those levels with the Maximum Permissible Exposure (MPE) limits established by the Federal Communications Commission.

2. Site Data

Site Name: <i>Partridge Hollow</i>	
Number of simultaneously operating channels	16
Type of antenna	Allgon 7250.03
Power per channel (Watts ERP)	250.0 Watts
Height of antenna (feet AGL)	140.00 feet
Antenna Aperture Length	5 feet

3. RF Exposure Prediction

The following equations established by the FCC, in conjunction with the site data, were used to determine the levels of RF electromagnetic energy present in the vicinity of the proposed facility¹:

$$\text{Power Density} = \frac{0.64 * N * EIRP(\theta)}{\pi * R^2} \quad (\text{mW/cm}^2) \quad \text{Eq. 1-Far-field}$$

Where, N = Number of channels, R = distance in cm from the RC (Radiation Center) of antenna, and $EIRP(\theta)$ = The isotropic power expressed in milliwatts in the direction of prediction point. This is the correct equation for antennas which have their gain expressed in dBi, which is the usual case for the PCS bands.

$$\text{Power Density} = \frac{P_{in} / ch * N * 10^3}{2 * \pi * R * h * \alpha / 360} \quad (\text{mW/cm}^2) \quad \text{Eq. 2-Near-field}$$

Where P_{in}/ch = Input power to antenna terminals in watts/ch, R = distance to center of radiation, h = aperture height in meters, α = 3 dB beam-width of horizontal pattern.

¹ RF exposure is measured and predicted in terms of power density in units of milliwatts (mW), a thousandth of a watt, or microwatts (μ W), a millionth of a watt, per square centimeter (cm^2). Data comparing predictive analysis with on site measurements has demonstrated that power density can be effectively predicted at given locations in the vicinity of a wireless antenna facility.

4. FCC Guidelines for Evaluating the Environmental Effects of RF Radiation

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by a Second Memorandum Opinion and Order. These new rules represent a consensus of the federal agencies responsible for the protection of public health and the environment, including the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the National Institute for Occupational Health and Safety (NIOSH), and the Occupational Safety and Health Administration (OSHA).

Under the laws that govern the delivery of wireless communications services in the United States, as amended by the Telecommunications Act of 1996, the FCC has exclusive jurisdiction over RF emissions from personal wireless antenna facilities, which include cellular, PCS, messaging and aviation sites.² Pursuant to its authority under federal law, the FCC has established rules to regulate the safety of emissions from these facilities.

5. Comparison with Standards

Exhibit A shows the levels of RF electromagnetic energy as one moves away from the antenna facility. As shown in Exhibit A, the maximum power density is 0.000509 mW/cm² which occurs at 1800 feet from the antenna facility. The chart in exhibit A also shows that the power density is only 0.000100 mW/cm² at a distance of 4 feet. Table 1 below shows the Maximum Permissible Exposure (MPE) limits established by the FCC. There are different MPE limits for public/uncontrolled and occupational/controlled environments.

Table 1: Maximum Permissible Exposure limits for RF radiation

Frequency	Public/Uncontrolled	Occupational/controlled	Maximum power density at Accessible location
Cellular	.580 mW/cm ²	2.9 mW/cm ²	0.000509 mW/cm ²
PCS	1 mW/cm ²	5 mW/cm ²	

The maximum power density at the proposed facility represents only 0.06% of the public MPE limit for PCS frequencies.

6. Conclusion

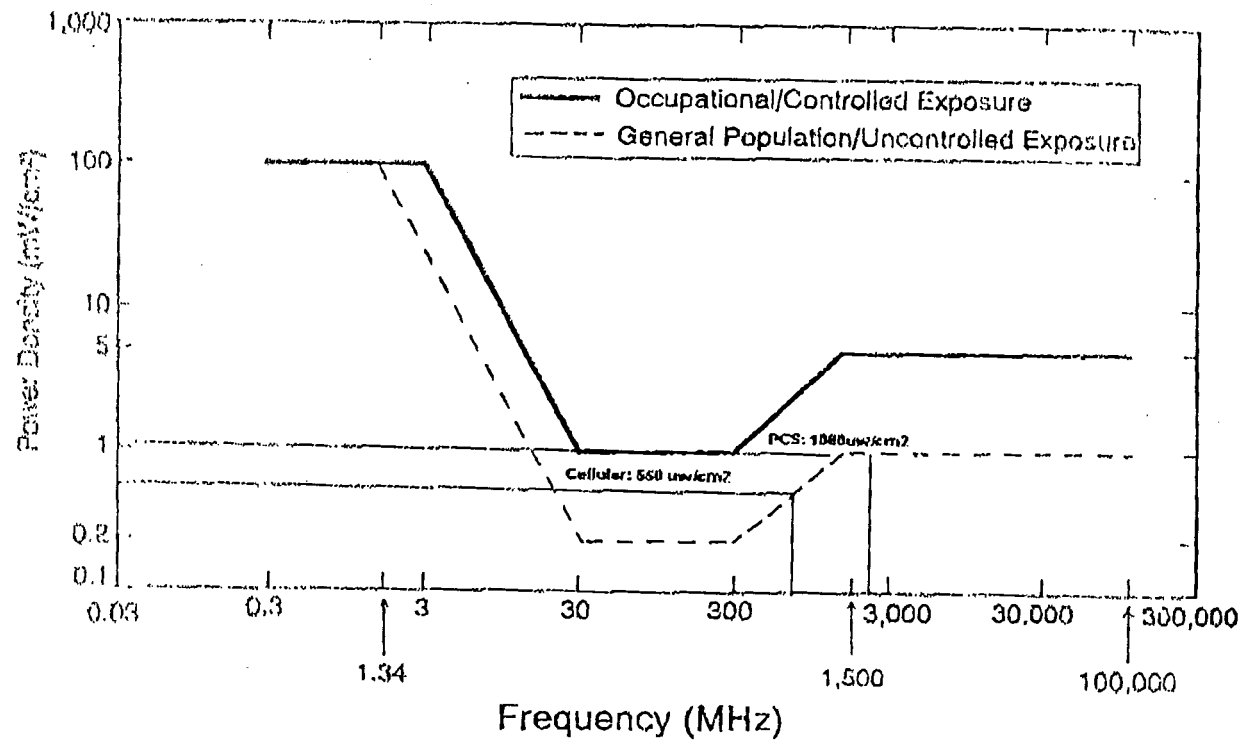
This analysis show that the maximum power density in accessible areas at this location is 0.000509 mW/cm², a level of RF energy that is well below the Maximum Permissible Exposure limit established by the FCC.

² 47 U.S.C. Section 332 (c) (7)(B)(iv) states that "[n]o State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission's regulations concerning such emissions."

7. FCC Limits for Maximum Permissible Exposure

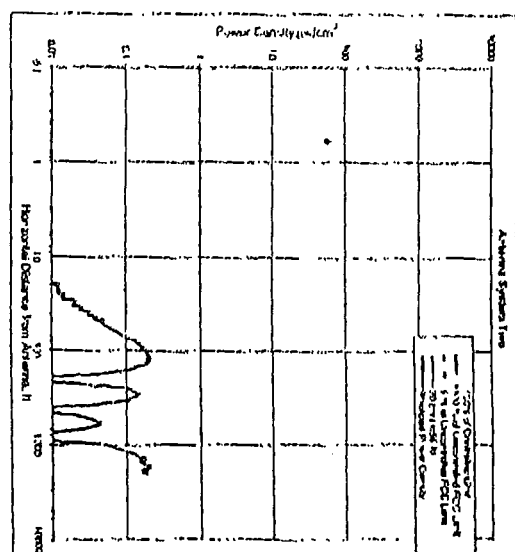
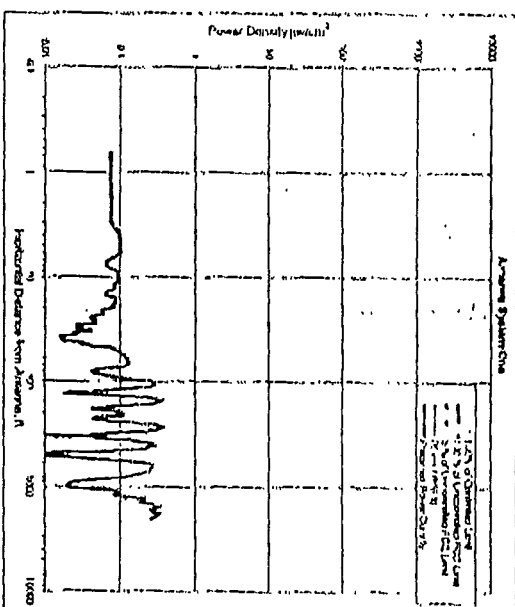
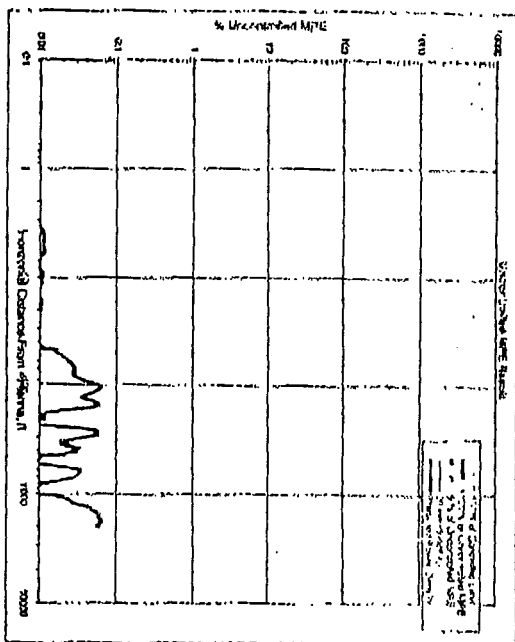
FCC Limits for Maximum Permissible Exposure (MPE)

Plane-wave Equivalent Power Density



AT&T Wireless Services, Inc.

B. Exhibit A



Number of Arguments Systems 2

Meets FCC Computed Limits for The Antennas Systems

Meets FCC Unrestricted Limits for The Noisy Systems

Meets 5th of FCC Unrecorded limits for The Academy Systems

No Further Measurable Fertilizable Exposure (NOFE) Analysis Spec. and

	Percent Density	Sp. Gr. Obs.
	my/cm ² % of iron	Fe/Fe
Majority of Fe atoms in Fe ²⁺ + O ²⁻ complex	0.75	1.00 ± 0.05
1.5% of Fe atoms in Fe ³⁺ + O ²⁻ complex		
Concentration of Fe ³⁺ in Fe ²⁺ + O ²⁻ complex	0.01	

STB B: 677-027-021
SHE HANNE BARNCE WATSON
STB LAMBERT: 110-277-277
WATSON: 110-277-277

Permanente J. No. 9: Salmon

Case **Friday**

	Units	Value
Frequencies	None	1941.00
# of Channels	#	16
New 63200	WHIS	210.00
Used Power/Cnrg Ant.	WHIS	5.36
(Covers 12 Channels)	Feet	1475.00
Chalkstone Point	Yard	41.00
(above ground on rock surface)		0.00
Ar-mex Model No.		Adjon 1250 0.3
Used Air Gun	n/a	16.30
Crown Rd	degree	0.00
Neocenes Hill	CS	1.00
He pit of aqueduct	Feet	5.11
Ant 1200	degrees	63.00
U. antenae (2500000)	Feet	13.25
width	Yards	9

Neel Durgam Chaf Durgam At 57

Section: 3

DATE: 05/25/2018

	units	Vision
Frequency	MHz	831.00
# of Channels	#	16
Nox (C/W)	Watts	750.00
Max Power Spectral Density (Center of Radio Unit)	Watts	18.53
Cable Loss Point	Feet	23.10
Calculation Point (Above ground at roof surface)	Feet	0.00
		0.00
		9.00
Antenna Mounting Height	ASD	ALP6041
Max Ant Gain	dBi	11.10
Diversity	cps	0.09
Weatherproofing Alt.	dB	0.30
Height of Obstruction	Feet	4.00
Air Temp	Celsius	95.00
Wind Speed (at 33 ft)	Mph	7.51 km
Windy	Y/N	N

Antenna System Inc.

As Sybil's only chance

25

04:12:13 42604

9. For Further Information

Additional information about the environmental impact of RF energy from personal wireless antenna facilities can be obtained from the Federal Communications Commission:

Dr. Robert Cleveland
Federal Communications Commission
Office of Engineering and Technology
Washington, DC 20554

RF Safety Program: 202-418-2464
Internet address: rfafety@fcc.gov
RF Safety Web Site: www.fcc.gov/oet/rfsafety

10. References

- [1] The Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 U.S.C. Section 332 (c)(7)(B)(iv).
- [2] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Notice of Proposed Rulemaking, ET Docket 93-62, 8 FCC Rcd 2849 (1993).
- [3] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Report and Order, ET Docket 93-62, FCC 96-326, adopted August 1, 1996. 61 Federal Register 41006 (1996).
- [4] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Second Memorandum Opinion and Order, ET Docket 93-62, adopted August 25, 1997.
- [5] *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields*, OET Bulletin 65, August, 1997.

RECEIVED

JUN 13 2002

**CONNECTICUT
SITING COUNCIL**
1971-1995**CUDDY & FEDER & WORBY LLP**90 MAPLE AVENUE
WHITE PLAINS, NEW YORK 10601-5196

(914) 761-1300

TELECOPIER (914) 761-5372/6405

500 171TH AVENUE

NEW YORK, NEW YORK 10101

(212) 944-2841

TELECOPIER (212) 944-2843

WESTAGE BUSINESS CENTER

300 SOUTH LAKE DRIVE

FISHKILL, NEW YORK 12524

(845) 896-2220

TELECOPIER (845) 896-3672

STAMFORD, CONNECTICUT
NORWALK, CONNECTICUTWILLIAMS NULL
DAWN M. PORTNEY
ELISABETH N. RADOW
NEIL F. RIMSKY
RUTH L. ROTH
JENNIFER L. VAN TUYL
CHAUNCEY L. WALKER (also CA)
ROBERT L. WOITZ
DAVID E. WORBY

Of Counsel

MICHAEL R. EDLHMAN
ANDREW A. GILKSON (also CT)
ROBERT L. OSAR (also TX)
MARYANN PALLERMO
ROBERT C. SCHNEIDER
LOUIS R. TALLERANEIL ALEXANDER (also CT)
CHARLES T. RAZANED (also NJ)
THOMAS R. RUFFINO (also DC)
THOMAS M. BLOMBERG
JOSEPH E. CARLUCCI
KENNETH J. DOWDNEY
ROBERT F. FISHER
CHRISTOPHER B. FISHER (also CT)
ANTHONY B. GORRE, III (also CT)
AUSAN H. GORDON
KARL G. GRANK
JOSHUA J. GRAHER
WAYNE J. MILLER (also CT)
KENTH L. JORIST
MICHAEL KATZ (also NJ)
JOSHUA E. KLEINBERG (also CT)
DAVID L. LEARY (also CT)
BARRY L. LONGTO: David Martin, Connecticut Siting CouncilFROM: Christopher B. Fisher, Esq.TELECOPIER NO. 860-827-2950DATE: 6/13/02 PAGES: 3 CLIENT 1844MESSAGE: (including Cover) MATTER: 683**IMPORTANT NOTICE:** The accompanying fax transmission is intended to be viewed and read only by the individual or entity named above. If you are not the intended recipient so named, you are prohibited from reading this transmission. You are also notified that any dissemination, distribution or copying of this transmission is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and return the original transmission to us by the U.S. Postal Service. Thank you.OPERATOR: Ruth Jaggers

IF THERE ARE ANY PROBLEMS, PLEASE NOTIFY OPERATOR IMMEDIATELY

(914) 761-1300 Ext.

256

CUDDY & FEDER & WORBY LLP

90 MAPLE AVENUE
WHITE PLAINS, NEW YORK 10601-5196

(914) 761-1300

TELECOPIER (914) 761-5372/6405

www.cfwlaw.com

500 FIFTH AVENUE
NEW YORK, NEW YORK 10110
(212) 944-2841
TELECOPIER (212) 944-2843WESTAGE BUSINESS CENTER
800 SOUTH LAKE DRIVE
FISHKILL, NEW YORK 12524
(845) 898-2220
TELECOPIER (845) 898-3872STAMFORD, CONNECTICUT
NORWALK, CONNECTICUTCUDDY & FEDER
1971-1995WILLIAM S. NIELL
DAWN M. PORTNEY
ELISABETH N. TARDOW
NEIL T. HILARY
RUTH E. ROSE
JENNIFER L. VAN LUYK
CHAUNCEY L. WALKER (also CA)
ROBERT L. WOLFE
DAVID E. WOLFEOF COUNSEL
MICHAEL H. CEFIMAN
ANDREW A. CLARKSON (also CT)
ROBERT L. OSAR (also TX)
MARIYANN M. PALCHMO
ROBERT C. SCHIFFRICH
LOUIS R. TATENAMIL J. ALEXANDER (also CT)
CHARLES I. BAZZANO (also NJ)
THOMAS R. BLUMBERG (also NJ)
ROBERT M. BROOKS
JEREMY C. CAGLIARDI
NORMAN J. DUNNIGAN
ROBERT E. FLEET
CHRISTOPHER D. GIBSON (also CT)
ANTHONY C. GRIFFIN (also CT)
LUCAS E. H. HARRISON
KATHLEEN M. HARRIS
JOSHUA J. HARRIS
WAYNE L. HARRIS (also CT)
FRANK H. JONES
LUCIANA L. KATZ (also NJ)
JOSHUA L. KATZ (also CT)
ANDREW F. LARBY (also CT)
BRIAN E. LONG

VIA FACSIMILE (860) 827-2950

David Martin

Siting Analyst

Connecticut Siting Council

10 Franklin Square

New Britain, Connecticut 06051

Re: EM-AT&T-070-020604 Killingworth

Dear Mr. Martin:

In response to your correspondence dated June 13, 2002 for the above referenced site, please be advised that AT&T's Horn Antennas were excluded from the MPE analysis because they are a redundant back up system that is not currently operational (See note on page 2 of our filing stating same). Even if the Horn Antennas were operational, it should be noted that they are microwave point to point antennas and would not add to the cumulative MPE for the site at grade given their highly directional path.

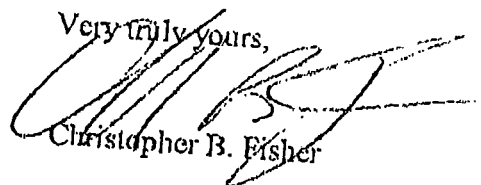
Additionally, the structural analysis as prepared by James E. Boltz utilized the original tower design and included two horn antennas at the 302.5' level and two horn antennas at the 187.5' level of the tower in the structural analysis. The tower currently supports only three of the original four horn antennas which are apparently still needed by AT&T in its landline infrastructure as a backup system. As such, the structural is overly conservative.

CUDDY & FEDER & WORBY LLP


June 13, 2002
Page 2

Should you or the Council have any questions or require any additional information,
please do not hesitate to contact us.

Very truly yours,



Christopher B. Fisher



EM-AT&T-070-020604
131 Little City Road
Killingworth 6/11/02