



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@ct.gov](mailto:siting.council@ct.gov)

Web Site: [portal.ct.gov/csc](http://portal.ct.gov/csc)

VIA ELECTRONIC MAIL

January 29, 2024

James Valeriani  
Structure Consulting Group, Inc.  
49 Brattle Street  
Arlington, MA 02474  
[jamesvaleriani@comcast.net](mailto:jamesvaleriani@comcast.net)

RE: **TS-DISH-080-230522** - Dish Wireless, LLC request for an order to approve tower sharing at an existing telecommunications facility located at 38 Elm Street, Meriden, Connecticut. **Decision-Denial**

Dear James Valeriani:

The Connecticut Siting Council (Council) hereby denies your request to share the above-referenced existing telecommunications facility, pursuant to Section 16-50j-90 of the Regulations of Connecticut State Agencies.

The Connecticut Siting Council (Council) received the tower share request for the above-referenced facility on May 22, 2023. On June 5, 2023, the Council issued a letter (enclosed) stating that the tower share request was incomplete because the radio frequency (RF) emissions analysis report provided with the request did not include a cumulative far-field analysis and the Structural Analysis Report (SA) and construction drawings (CD) did not cite the 2022 Connecticut State Building Code (CSBC). The Council recommended that DISH provide an RF Analysis including a rigorous cumulative far-field analysis for all entities located on the tower that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, and an updated Structural Analysis Report and construction drawings that comport with the current 2022 CSBC on or before July 5, 2023. The Council granted an extension of time to submit the required documentation to November 13, 2023.

On November 8, 2023, the Council received an electronic mail with a revised SA, CD and RF dated November 3, 2023, June 5, 2023 and November 14, 2022, respectively. However, the RF analysis did not include a rigorous cumulative **far-field analysis for all entities** located on the tower. The RF analysis provided was the same document that was in the tower share request and uses a near-field analysis for Verizon's antennas. On November 14, 2023, the Council issued a second incomplete notice (enclosed). On November 16, 2023 the Council granted an extension of time to submit the required documentation to January 24, 2024. To date the Council has not received the requested information.

Thus, the proposed tower share request is not in compliance with the criteria in Section 16-50j-89 of the Regulations of Connecticut State Agencies and is hereby denied.

Thank you for your attention to this matter. Should you have any questions, please feel free to contact me at 860-827-2951.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie Bachman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Melanie Bachman  
Executive Director

MAB/ANM/laf

Enclosure: Incomplete Letter dated June 5, 2023.  
Second Incomplete Letter dated November 14, 2023

c: The Honorable Kevin M. Scarpati, Mayor, City of Meriden ([kscarpati@meridenct.gov](mailto:kscarpati@meridenct.gov))  
Emily Holland, Acting City Manager, City of Meriden ([eholland@meridenct.gov](mailto:eholland@meridenct.gov))



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**VIA ELECTRONIC MAIL**

June 5, 2023

James Valeriani  
Structure Consulting Group, Inc.  
49 Brattle Street  
Arlington, MA 02474  
[jamesvaleriani@comcast.net](mailto:jamesvaleriani@comcast.net)

**RE: TS-DISH-080-230522** - Dish Wireless, LLC request for an order to approve tower sharing at an existing telecommunications facility located at 38 Elm Street, Meriden, Connecticut.

Dear James Valeriani:

The Connecticut Siting Council (Council) received the tower share request for the above-referenced facility on May 22, 2023.

According to Section 16-50j-90 of the Regulations of Connecticut State Agencies, “no tower share application shall be approved until a complete application containing all information deemed relevant by the Council has been filed. Relevant information shall at a minimum include that listed in Section 16-50j-89 of the Regulations of Connecticut State Agencies...”

Staff has reviewed this tower share request for completeness and has identified the following deficiencies:

- a. On September 23, 2022, the Council issued a memorandum to telecommunications industry representatives requiring a cumulative far-field Radio Frequency Power Density Analysis to be provided with all telecommunications tower share requests. The radio frequency (RF) emissions analysis report prepared by EBI Consulting and dated November 14, 2022 and provided with the request does not include a cumulative far-field analysis. A copy of the memorandum is available on the Council’s website at the following link: [20220923-farfieldmemo\\_final.pdf](http://portal.ct.gov/20220923-farfieldmemo_final.pdf) (ct.gov); and
- b. the Structural Analysis Report dated October 20, 2022 and construction drawings dated December 16, 2022 provided with the filing cite 2018 Connecticut State Building Code (CSBC) which incorporates the 2015 International Building Code (IBC); however, the State of Connecticut has adopted the 2022 CSBC which incorporates the 2021 IBC; effective October 1, 2022.

Therefore, the tower share request is incomplete at this time. The Council recommends that DISH provide an RF Analysis including a rigorous cumulative far-field analysis for all entities located on the tower that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, and an updated Structural Analysis Report and construction drawings that comport with the current 2022 CSBC on or before July 5, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to July 5, 2023. **Please provide an electronic version and one hard copy of the requested information for the incomplete tower share filing to be rendered complete and processed. Please include the Council’s tower share identification number referenced above with the submittal.**

This notice of incompleteness shall have the effect of tolling the Federal Communications Commission (FCC) 60-day timeframe in accordance with Paragraph 217 of the FCC Wireless Infrastructure Report and Order issued on October 21, 2014 (FCC 14-153).

Thank you for your attention to this matter. Should you have any questions, please feel free to contact me at 860-827-2951.

Sincerely,

A handwritten signature in dark ink, appearing to read "Melanie A. Bachman". The signature is fluid and cursive, with the first name being the most prominent.

Melanie A. Bachman  
Executive Director

MAB/ANM/dll



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VIA ELECTRONIC MAIL

November 14, 2023

James Valeriani  
Structure Consulting Group, Inc.  
49 Brattle Street  
Arlington, MA 02474  
[jamesvaleriani@comcast.net](mailto:jamesvaleriani@comcast.net)

**RE: TS-DISH-080-230522** - Dish Wireless, LLC request for an order to approve tower sharing at an existing telecommunications facility located at 38 Elm Street, Meriden, Connecticut. **Second Notice of Incomplete Request.**

Dear James Valeriani:

The Connecticut Siting Council (Council) received the tower share request for the above-referenced facility on May 22, 2023. On June 5, 2023, the Council issued a letter (enclosed) stating that the tower share request was incomplete because the radio frequency (RF) emissions analysis report provided with the request did not include a cumulative far-field analysis and the Structural Analysis Report (SA) and construction drawings (CD) did not cite the 2022 Connecticut State Building Code (CSBC). The Council recommended that DISH provide an RF Analysis including a rigorous cumulative far-field analysis for all entities located on the tower that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, and an updated Structural Analysis Report and construction drawings that comport with the current 2022 CSBC on or before July 5, 2023. The Council granted an extension of time to submit the required documentation to November 13, 2023.

On November 8, 2023, the Council received an electronic mail with a revised SA, CD and RF dated November 3, 2023, June 5, 2023 and November 14, 2022, respectively. However, the RF analysis does not include a rigorous cumulative **far-field analysis for all entities** located on the tower. The RF analysis provided is the same document that was in the tower share request and uses a near-field analysis for Verizon's antennas.

Therefore, the tower share request remains incomplete at this time. The Council recommends that Dish Wireless provide an RF Analysis including a rigorous cumulative **far-field analysis for all entities** located on the tower that accounts for a 6-foot tall person and the actual antenna pattern for the proposed modifications to the facility with a cumulative %MPE at or below 100%, November 24, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to November 24, 2023. **Please provide an electronic version and one hard copy of the requested information for the incomplete tower share filing to be rendered complete and processed. Please include the Council's tower share identification number referenced above with the submittal.**

This notice of incompleteness shall have the effect of tolling the Federal Communications Commission (FCC) 60-day timeframe in accordance with Paragraph 217 of the FCC Wireless Infrastructure Report and Order issued on October 21, 2014 (FCC 14-153).

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Melanie Bachman  
Executive Director

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Enclosure: Incomplete Letter dated June 5, 2023.