



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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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, written over a light blue horizontal line.

Melanie A. Bachman  
Executive Director

MAB/ANM/dll