



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

April 28, 2023

Jack Andrews
Centerline Communications
10130 Donleigh Drive
Columbia, MD 21046
jmandrews@clinellc.com

RE: **EM-VER-088-230410** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 585 South Main Street, Naugatuck, Connecticut.

Dear Jack Andrews:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on April 10, 2023.

According to Section 16-50j-71 of the Regulations of Connecticut State Agencies, "...any modification, as defined in Section 16-50j-2a of the Regulations of Connecticut State Agencies, to an existing tower site, except as specified in Sections 16-50j-72 and 16-50j-88 of the Regulations of Connecticut State Agencies, may have a substantial adverse environmental effect."

Staff has reviewed this exempt modification request for completeness and has identified the following deficiencies:

- a. The Structural Analysis Report, and Mount Analysis dated July 22, 2021 and associated drawings dated July 23, 2021, provided with the filing cite ANSI/TIA-222-H and construction drawings dated September 24, 2021 cite International Building Code with no indication of which version. However, the State of Connecticut has adopted the 2022 Connecticut State Building Code (CSBC) effective October 1, 2022.
- b. 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 exempt modification requests. The radio frequency emissions report 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/csc/20220923-farfieldmemo_final.pdf) (ct.gov).
- c. The request lacks documentation of the original facility approval and any conditions of such approval or correspondence with the Borough of Naugatuck stating that the town no longer retains records of its decision.

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Verizon provide an updated Structural Analysis Report, Mount Analysis, and construction drawings that comport with the current 2022 CSBC, 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 documentation showing the original facility approval with conditions if any or correspondence with the Borough stating that there are no records of the original facility approval on or before May 26, 2023. If additional time is

needed to gather the requested information, please submit a written request for an extension of time prior to May 26, 2023. **Please provide an electronic version and one hard copy of the requested information for the incomplete exempt modification to be rendered complete and processed. Please include the Council's exempt modification 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 Bachman". The signature is fluid and cursive, with the first name being the most prominent.

Melanie Bachman
Executive Director

MAB/ANM/laf