



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

July 25, 2022

Denise Sabo
Northeast Site Solutions
4 Angela's Way
Burlington, CT 06013
denise@northeastsitesolutions.com

RE: **EM-VER-089-220622** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 115 North Mountain Road, New Britain, Connecticut.

Dear Ms. Sabo:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on June 22, 2022.

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 deficiencies in the Cumulative Power Density Table (Power Density Table) and the Structural Analysis Report (SA) dated May 11, 2022.

Council staff calculated the power density for the proposed Verizon modification using the data provided in its records for other carriers and the Power Density Table. Using the Federal Communications Commission (FCC) OET Bulletin 65 predictive methods accounting for the -10 dB off beam pattern adjustment and a 6-foot tall person at ground level, the results indicate that the requested modification, as proposed, would produce radio frequency emissions with a %MPE of 25.77% for each sector of Verizon's antennas. Adding this to the 88.39% for other carriers results in a cumulative %MPE of 114.15% with Verizon's antennas. This exceeds the FCC's allowable General Public/Uncontrolled cumulative MPE limit of 100%.

Please refer to the Council's 2015 exempt modification filing memo (link added below) for filing requirements and procedures.

<https://portal.ct.gov/-/media/CSC/Guides/EMFilingMemo111015pdf.pdf>

Additionally, the SA does not appear to include the most up to date approved structural loading for AT&T. Please see the structural analysis report for EM-ATT-089-170328 for the AT&T antenna loading.

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Verizon provide a cumulative Radio Frequency Analysis Report including a rigorous far-field analysis for Verizon that accounts for a six-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 SA taking into account the latest approved AT&T structural loading, on or before August 22, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to August 22, 2022.

Please provide an electronic version 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 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 black 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/MP