



**SAI Group**  
12 Industrial Way  
Salem, NH 03079  
603-421-0470

June 10, 2022

Melanie A. Bachman  
Executive Director  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

**Notice of Exempt Modification – New Cingular Wireless PCS, LLC (AT&T)**  
**1 Waterfront Park (City Pier), New London, CT 06320**  
**N 41.353661**  
**W 72.091336**

Dear Ms. Bachman:

AT&T intends to install a temporary cellular communications facility for service during Sailfest 2022 in New London. Please accept this letter as notification pursuant to Regulations of Connecticut State Agencies § 16-50j-73, of construction that constitutes an exempt modification under R.C.S.A. § 16-50j-72(d). In accordance with R.C.S.A. § 16-50j-73, a copy of this letter is being sent to Mayor Michael Passero, as elected official and property owner, and to Felix Reyes, Director of Development and Planning for the City of New London.

AT&T operates under licenses issued by the Federal Communications Commission (FCC) to provide cellular and PCS mobile telephone service in New London County, which includes the area to be served by AT&T's proposed temporary installation. The proposed temporary facility would be installed at 1 Waterfront Park on property owned by the City of New London.

#### **Proposed Temporary Facility**

The proposed temporary cell site meets the criteria set forth in R.C.S.A § 16-50j-72(d) for temporary cellular service for events of statewide significance. The site is necessary to provide additional system capacity to accommodate increased communication needs during Sailfest 2022. This modification may include B2, B5, B17, B14, B29, B30, B66 & n77 hardware that is 4G(LTE) and/or 5GNR capable through remote software configuration and either or both services may be turned on or off at various times.

Sailfest 2022 will be held in the vicinity of Waterfront Park in downtown New London on July 8<sup>th</sup> – 10<sup>th</sup> 2022. The temporary cell site will be located at the far end of City Pier as illustrated in the attached Aerial Photograph. As previously documented by AT&T, the City Assessor has confirmed that the 31,000 sq. ft. pier is considered an outbuilding of the City Pier property. An e-mail from New London City Dock Master Barbara Neff authorizing AT&T to use the City Pier for this purpose is attached. AT&T's equipment will be deployed to City Pier on or around June 20th. The site will begin on-air operations on July 6th and be removed on or around July 12<sup>th</sup>.

AT&T's temporary cell site will consist of radio equipment installed in a fully-contained vehicle referred to as a Mini Super COLT (Cell on Light Truck) with two built-in antenna masts that will be extended to a height of approximately 59 ft above ground level. Power and Telephone connections will be provided from the existing utility services at the Pier. The proposed temporary cell site will not increase noise levels by six decibels or more.

One Matsing MS-12.6 DB180-A Multi-Beam Dual Band Spherical Lens Antenna will be mounted at a centerline of 52 feet; Three (3) Kathrein 840-10520 antennas will be mounted at 44 feet; and one Matsing MS-6.3 DB90 and one Ericsson AIR1281 Antenna will be mounted at 36 feet. The total height of the entire structure with appurtenances will be approximately 60 feet above ground level.

### **Power Density Calculations**

AT&T's temporary cell site will not result in radio frequency emission levels at or above the Federal Communications Commission safety standard, as documented in the attached Radio Frequency Exposure report. This report shows that AT&T's temporary transmissions for the COW installation will result in a power density corresponding to approximately 80.7% of the FCC MPE limits for uncontrolled environments.

### **Conclusion**

For the foregoing reasons, AT&T respectfully submits that the proposed modifications to the above-referenced telecommunications facility constitute an exempt modification under R.C.S.A. § 16-50j-72(b)(2).

Please feel free to call me at (860) 670-9068 with any questions regarding this Notice. Thank you for your consideration in this matter.

Sincerely,

*Mark Roberts*

Mark Roberts  
Consultant for SAI  
Mark.Roberts@QCDevelopment.net

Attachments

cc:      Mayor Michael Passero – Elected Official & Property Owner  
          Felix J. Reyes – Director of Development & Planning  
          Barbara J. Neff – New London City Dock Master & Sailfest Executive Director



**Proposed Location of COW**  
**End of City Pier**



ATM	Beer Tent	Streets closed	Public Restroom	Tall ships	Amusement Rides
Custom House Pier Stage	Fireworks Experience/Picnic on the Pier	Waterfront vendors	Police & Emergency/Lost Persons	City Hall Stage	Street vendors (sat/sun only)
Hygienic Art Park Stage	Hygienic Outdoor Fine Craft Festival	Sailfest Information & Merchandise			Public Parking
					Handicapped Parking
					SK Road Race (Sunday)

**sailfest Hours -** Friday 12 noon-11pm • Saturday 10am-11pm • Sunday 9am-6pm







C Squared Systems, LLC  
65 Dartmouth Drive  
Auburn, NH 03032  
603-644-2800  
[support@csquaredsystems.com](mailto:support@csquaredsystems.com)

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## Calculated Radio Frequency Exposure



CT4992

5 Waterfront Park, New London, CT

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June 8, 2022

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## 1. Introduction

The purpose of this report is to investigate compliance with applicable FCC regulations for the proposed temporary deployment for Sailfest of AT&T antenna arrays on top of the Mini Super COLT (Cell On Light Truck) to be located at 5 Waterfront Park in New London CT. The coordinates of the proposed deployment are 41-21-13.23 N, 72-05-29.05 W

AT&T is proposing the following:

- 1) Temporarily deploy multi-band antennas on its Mini Super COLT to support its commercial LTE network and the FirstNet National Public Safety Broadband Network (“NPSBN”) during the Sailfest celebration in New London CT.

This report considers the planned antenna configuration for AT&T<sup>1</sup> to derive the resulting % Maximum Permissible Exposure of its proposed temporary deployment.

## 2. FCC Guidelines for Evaluating RF Radiation Exposure Limits

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 OET Bulletin 65 Edition 97-01. These new rules include Maximum Permissible Exposure (MPE) limits for transmitters operating between 300 kHz and 100 GHz. The FCC MPE limits are based upon those recommended by the National Council on Radiation Protection and Measurements (NCRP), developed by the Institute of Electrical and Electronics Engineers, Inc., (IEEE) and adopted by the American National Standards Institute (ANSI).

The FCC general population/uncontrolled limits set the maximum exposure to which most people may be subjected. General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure.

Public exposure to radio frequencies is regulated and enforced in units of milliwatts per square centimeter (mW/cm<sup>2</sup>). The general population exposure limits for the various frequency ranges are defined in the attached “FCC Limits for Maximum Permissible Exposure (MPE)” in Attachment B of this report.

Higher exposure limits are permitted under the occupational/controlled exposure category, but only for persons who are exposed as a consequence of their employment and who have been made fully aware of the potential for exposure, and they must be able to exercise control over their exposure. General population/uncontrolled limits are five times more stringent than the levels that are acceptable for occupational, or radio frequency trained individuals. Attachment B contains excerpts from OET Bulletin 65 and defines the Maximum Exposure Limit.

Finally, it should be noted that the MPE limits adopted by the FCC for both general population/uncontrolled exposure and for occupational/controlled exposure incorporate a substantial margin of safety and have been established to be well below levels generally accepted as having the potential to cause adverse health effects.

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<sup>1</sup> As referenced to AT&T’s Radio Frequency Design Sheet dated 4/22/22.

### 3. RF Exposure Calculation Methods

The power density calculation results were generated using the following formula as outlined in FCC bulletin OET 65:

$$\text{Power Density} = \left( \frac{1.6^2 \times 1.64 \times \text{ERP}}{4\pi \times R^2} \right) \times \text{Off Beam Loss}$$

Where:

ERP = Effective Radiated Power

$R = \text{Radial Distance} = \sqrt{(H^2 + V^2)}$

H = Horizontal Distance from antenna

V = Vertical Distance from radiation center of antenna

Ground reflection factor of 1.6

Off Beam Loss is determined by the selected antenna pattern

These calculations assume that the antennas are operating at 100 percent capacity and power, and that all antenna channels are transmitting simultaneously. Obstructions (trees, buildings, etc.) that would normally attenuate the signal are not taken into account. The calculations assume even terrain in the area of study and do not consider actual terrain elevations which could attenuate the signal. As a result, the predicted signal levels reported below are much higher than the actual signal levels will be from the final temporary deployment.

#### 4. Calculation Results

Table 1 below outlines the cumulative power density information for the temporary AT&T Mini Super COLT at the Sailfest celebration. The proposed antennas are directional in nature; therefore, the majority of the RF power is focused out towards the horizon. As a result, there will be less RF power directed below the antennas relative to the horizon, and consequently lower power density levels around the base of the Mini Super COLT. Please refer to Attachment C for the vertical pattern of the proposed AT&T antennas.

Carrier	Number of Transmitters	Power out of Base Station Per Transmitter (Watts)	Antenna Height (Feet)	Distance to the Base of Antennas (Feet)	Power Density (mW/cm <sup>2</sup> )	Limit (mW/cm <sup>2</sup> )	% MPE
AT&T LTE 1900 MHz	1	160.0	52	98	0.005611	1.000	0.56%
AT&T LTE 2100 MHz	1	240.0	52	98	0.016412	1.000	1.64%
AT&T LTE 2300 MHz	1	80.0	52	98	0.005399	1.000	0.54%
AT&T LTE 722 MHz	1	160.0	44	98	0.038890	0.481	8.08%
AT&T LTE 763 MHz	1	160.0	36	98	0.330608	0.509	64.99%
AT&T LTE 875 MHz	1	160.0	52	98	0.002149	0.583	0.37%
AT&T 5G 39 GHz	1	1.0	30	98	0.045100	1.000	4.51%
						<b>Total</b>	<b>80.70%</b>

**Table 1: Carrier Information<sup>2</sup>**

<sup>2</sup> Please note that % MPE values listed are rounded to two decimal points and the total % MPE listed is a summation of each unrounded contribution. Therefore, summing each rounded value may not identically match the total value reflected in the table.

## 5. Conclusion

The above analysis concludes that RF exposure at ground level from the proposed facility will be below the maximum power density levels as outlined by the FCC in the OET Bulletin 65 Ed. 97-01. Using conservative calculation methods, the highest expected percent of Maximum Permissible Exposure at ground level for AT&T's equipment is **80.70% of the FCC General Population/Uncontrolled limit.**

As noted previously, the calculated % MPE levels are more conservative (higher) than the actual signal levels will be from the actual temporary deployment.

## 6. Statement of Certification

I certify to the best of my knowledge that the statements in this report are true and accurate. The calculations follow guidelines set forth in FCC OET Bulletin 65 Edition 97-01, ANSI/IEEE Std. C95.1 and ANSI/IEEE Std. C95.3.



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June 8, 2022  
Date

Reviewed/Approved By: Martin J. Lavin  
Senior RF Engineer  
C Squared Systems, LLC

### Attachment A: References

OET Bulletin 65 - Edition 97-01 - August 1997 Federal Communications Commission Office of Engineering & Technology

IEEE C95.1-2005, IEEE Standard Safety Levels With Respect to Human Exposure to Radio Frequency Electromagnetic Fields, 3 kHz to 300 GHz IEEE-SA Standards Board

IEEE C95.3-2002 (R2008), IEEE Recommended Practice for Measurements and Computations of Radio Frequency Electromagnetic Fields With Respect to Human Exposure to Such Fields, 100 kHz-300 GHz IEEE-SA Standards Board

## Attachment B: FCC Limits for Maximum Permissible Exposure (MPE)

### **(A) Limits for Occupational/Controlled Exposure<sup>3</sup>**

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (E) (A/m)	Power Density (S) (mW/cm <sup>2</sup> )	Averaging Time  E  <sup>2</sup> ,  H  <sup>2</sup> or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f <sup>2</sup> )*	6
30-300	61.4	0.163	1.0	6
300-1500	-	-	f/300	6
1500-100,000	-	-	5	6

### **(B) Limits for General Population/Uncontrolled Exposure<sup>4</sup>**

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (E) (A/m)	Power Density (S) (mW/cm <sup>2</sup> )	Averaging Time  E  <sup>2</sup> ,  H  <sup>2</sup> or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f <sup>2</sup> )*	30
30-300	27.5	0.073	0.2	30
300-1500	-	-	f/1500	30
1500-100,000	-	-	1.0	30

f = frequency in MHz \* Plane-wave equivalent power density

**Table 2: FCC Limits for Maximum Permissible Exposure (MPE)**

<sup>3</sup> Occupational/controlled limits apply in situations in which persons are exposed as a consequence of their employment provided those persons are fully aware of the potential for exposure and can exercise control over their exposure. Limits for occupational/controlled exposure also apply in situations when an individual is transient through a location where occupational/controlled limits apply provided he or she is made aware of the potential for exposure

<sup>4</sup> General population/uncontrolled exposures apply in situations in which the general public may be exposed, or in which persons that are exposed as a consequence of their employment may not be fully aware of the potential for exposure or cannot exercise control over their exposure

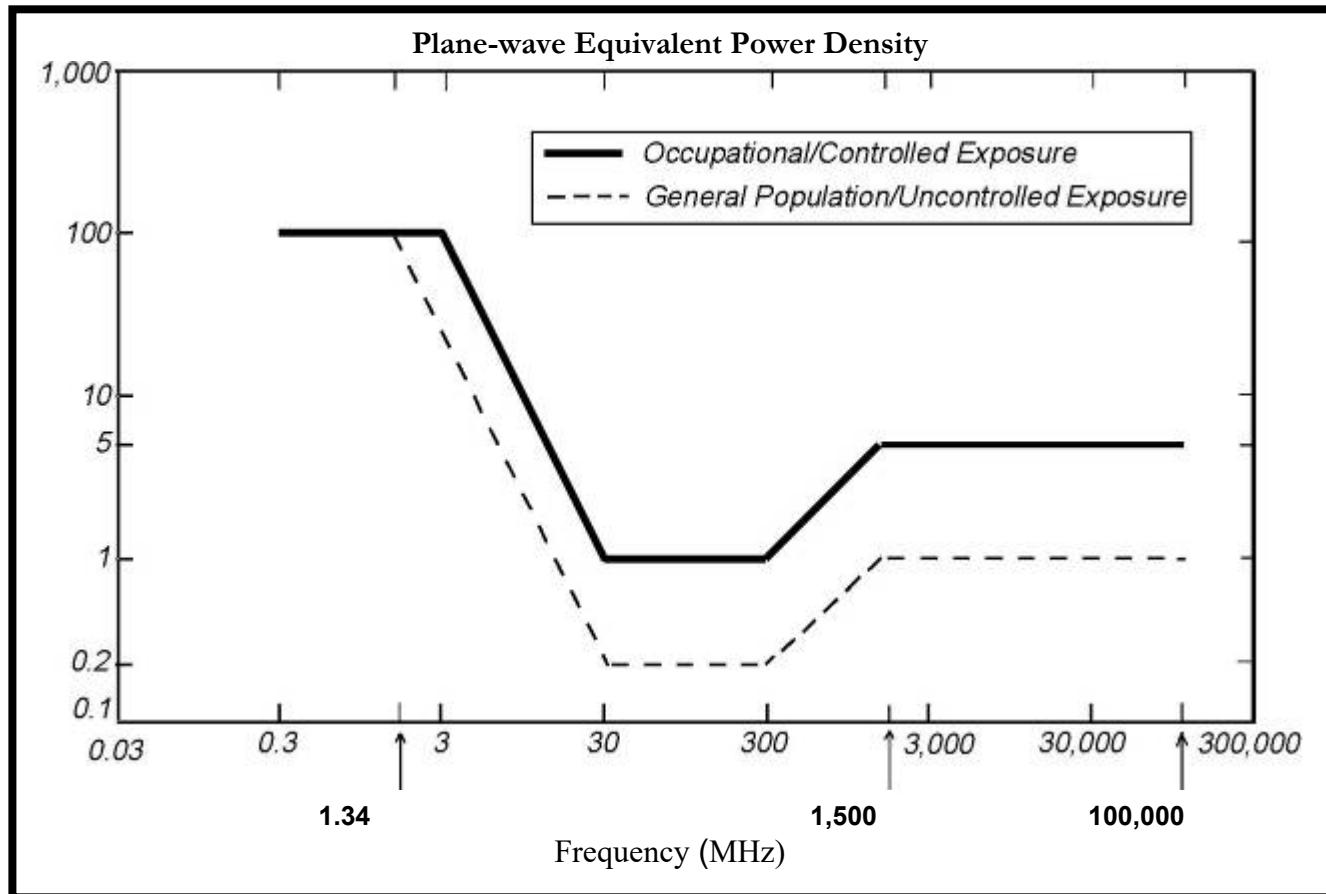
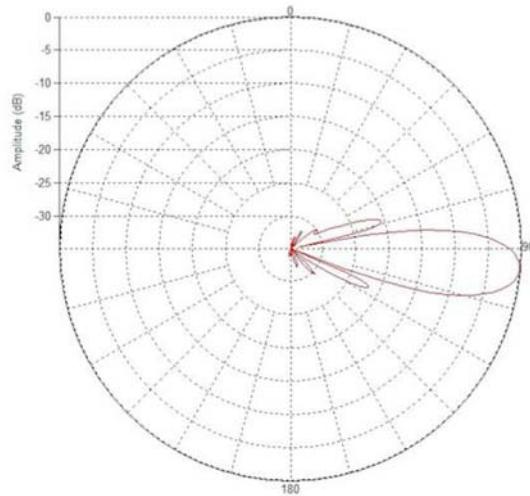


Figure 1: Graph of FCC Limits for Maximum Permissible Exposure (MPE)

### Attachment C: AT&T Antenna Data Sheets and Electrical Patterns

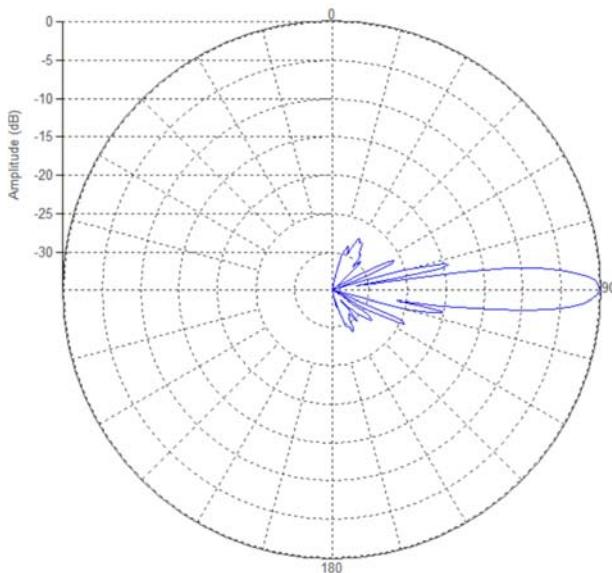
#### 698-960 MHz

Manufacturer: Matsing  
 Model #: MS-12.6DB180-A  
 Frequency Band: 698-960 MHz  
 Gain: 16.5 dBi  
 Vertical Beamwidth: 23°  
 Horizontal Beamwidth: 23°  
 Polarization: Dual Slant ±45°  
 73.79" x 81.56" x  
 80.54"  
 Size L x W x D:



#### 1695-2690 MHz

Manufacturer: Matsing  
 Model #: MS-12.6DB180-A  
 Frequency Band: 1695-2690 MHz  
 Gain: 22.8 dBi  
 Vertical Beamwidth: 12°  
 Horizontal Beamwidth: 12°  
 Polarization: Dual Slant ±45°  
 73.79" x 81.56" x  
 80.54"



# CITY PIER

**Location** CITY PIER **City, State, Zip**

**Mblu** G12/ 108/ 2/A / **Acct#** G12 0108 0002A

**Owner** NEW LONDON CITY OF-WAT **Assessment** \$3,656,240

**Appraisal** \$5,223,200 **PID** 4446

**Building Count** 1

## Current Value

Appraisal			
Valuation Year	Improvements	Land	Total
2018	\$4,189,200	\$1,034,000	\$5,223,200
Assessment			
Valuation Year	Improvements	Land	Total
2018	\$2,932,440	\$723,800	\$3,656,240

## Owner of Record

**Owner** NEW LONDON CITY OF-WAT **Sale Price** \$0  
**Co-Owner** CITY PIER **Certificate**  
**Address** 181 STATE STREET **Book & Page** 2083/0066  
NEW LONDON, CT 06320 **Sale Date** 09/25/2014  
**Instrument** 24

## Ownership History

Ownership History					
Owner	Sale Price	Certificate	Book & Page	Instrument	Sale Date
NEW LONDON CITY OF-WAT	\$0		2083/0066	24	09/25/2014
NEW LONDON CITY OF-WAT	\$0		1810/0260	19	12/03/2008
NEW LONDON CITY OF-WAT	\$0		0000/0000		01/01/1700

## Building Information

### Building 1 : Section 1

**Year Built:** 1950  
**Living Area:** 156

Replacement Cost: \$13,729

Building Percent Good: 47

Replacement Cost

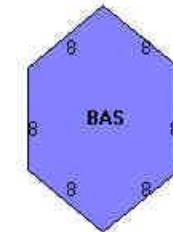
Less Depreciation: \$6,500

### Building Photo



(<https://images.vgsi.com/photos/NewLondonCTPhotos//00\01\12\10.jpg>)

### Building Layout



([https://images.vgsi.com/photos/NewLondonCTPhotos//Sketches/4446\\_44](https://images.vgsi.com/photos/NewLondonCTPhotos//Sketches/4446_44))

Building Sub-Areas (sq ft)		Legend	
Code	Description	Gross Area	Living Area
BAS	First Floor	156	156
		156	156

Building Attributes	
Field	Description
Style:	Commercial
Model	Commercial
Grade	Above Ave
Stories:	2
Occupancy	1.00
Exterior Wall 1	Wood Shingle
Exterior Wall 2	
Roof Structure	Gable/Hip
Roof Cover	Asph/F Gls/Cmp
Interior Wall 1	Wall Brd/Wood
Interior Wall 2	
Interior Floor 1	Concr-Finished
Interior Floor 2	
Heating Fuel	Coal or Wood
Heating Type	None
AC Type	None
Struct Class	
Bldg Use	MUNICIPAL MDL-94
Total Rooms	
Total Bedrms	00
Total Baths	0
Conv Type	
1st Floor Use:	903C
Heat/AC	NONE
Frame Type	WOOD FRAME
Baths/Plumbing	NONE
Ceiling/Wall	CEIL & WALLS
Rooms/Prtns	LIGHT
Wall Height	16.00
% Comm Wall	0.00

### Extra Features

Extra Features		Legend	
Code	Description	Size	Value
MSC50	PLB & EL FPR PIER PER PLANS	1.00 UNIT	\$157,000
			1

CNP2	CANOPY-GOOD	684.00 SF	\$38,500	1
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## Land

### Land Use

Use Code	903C	Size (Acres)	0.56
Description	MUNICIPAL MDL-94	Frontage	0
Zone	WD	Depth	0
Neighborhood	CBD1	Assessed Value	\$723,800
Alt Land Appr	No	Appraised Value	\$1,034,000
Category			

### Outbuildings

Outbuildings						Legend
Code	Description	Sub Code	Sub Description	Size	Value	Bldg #
DOLP	SHIP MOORING			18.00 UNIT	\$360,000	1
MSC13	PHASE 3			1.00 UNIT	\$65,000	1
DCK2	COMM DOCK			31150.00 S.F.	\$3,083,900	1
BTH2	W/PLUMBING			432.00 S.F.	\$9,300	1
PAT2	PATIO-GOOD			20000.00 S.F.	\$100,000	1
MOOR	MOORING			41.00 UNIT	\$369,000	1

### Valuation History

Appraisal			
Valuation Year	Improvements	Land	Total
2021	\$4,189,200	\$1,034,000	\$5,223,200
2020	\$4,189,200	\$1,034,000	\$5,223,200
2019	\$4,189,200	\$1,034,000	\$5,223,200

Assessment			
Valuation Year	Improvements	Land	Total
2021	\$2,932,440	\$723,800	\$3,656,240
2020	\$2,932,440	\$723,800	\$3,656,240
2019	\$2,932,440	\$723,800	\$3,656,240

**Property Information**

**Property ID** 95 G12 108 2A  
**Location** CITY PIER  
**Owner** NEW LONDON CITY OF WAT

SCCOG

**MAP FOR REFERENCE ONLY  
NOT A LEGAL DOCUMENT**

SCCOG makes no claims and no warranties, expressed or implied, concerning the validity or accuracy of the GIS data presented on this map.

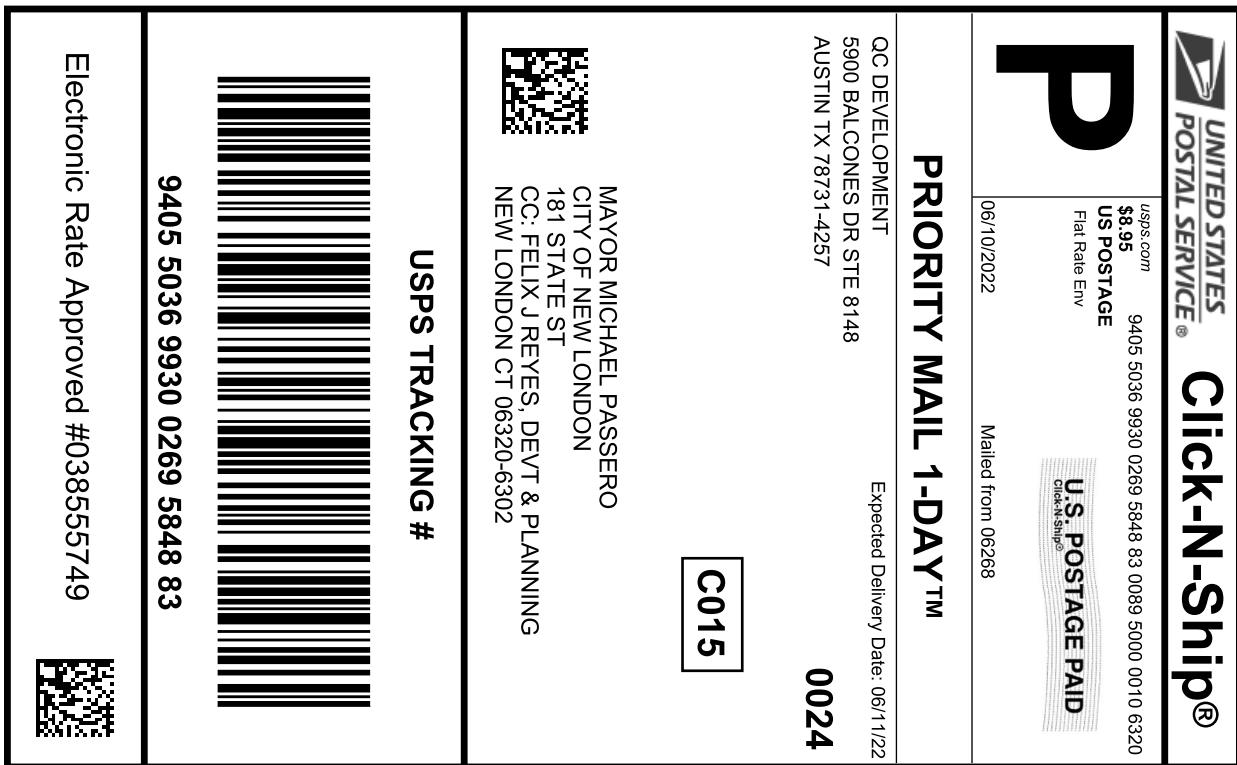
Parcels updated 01/11/2017  
Properties updated 10/1/2013

**From:** [Barbara J. Neff](#)  
**To:** [Mark Roberts](#)  
**Subject:** Re: AT&T SAILFEST TEMP SITE 2022  
**Date:** Wednesday, May 11, 2022 12:14:36 PM

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This email authorizes AT&T Wireless and/or its authorized agent to file for all necessary federal state or local permits and approvals for the proposed temporary wireless telecommunications facility located at the end of City Pier -1 Waterfront Park, New London, CT for the 2022 Sailfest

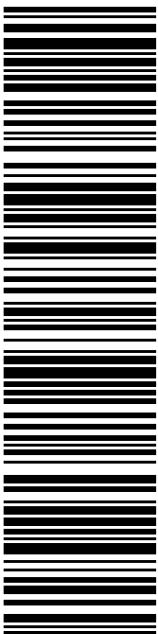
Barbara J. Neff  
***Neff Productions***  
***2 State ST***  
***New London CT 06320***  
***\* Sailfest - Executive Director***  
***\* New London City Dock Master***  
[www.neffproductions.com](http://www.neffproductions.com)  
(860) 443- 3786



—X— *Cut on dotted line.*

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4. To mail your package with PC Postage®, you may schedule a Package Pickup online, hand to your letter carrier, take to a Post Office™, or drop in a USPS collection box.
5. Mail your package on the "Ship Date" you selected when creating this label.



**9405 5036 9930 0269 5848 83**

Electronic Rate Approved #038555749



Thank you for shipping with the United States Postal Service!

Check the status of your shipment on the USPS Tracking® page at [usps.com](http://usps.com)

## Click-N-Ship® Label Record

**USPS TRACKING # :**  
**9405 5036 9930 0269 5848 83**

Trans. #:	565278519	Priority Mail® Postage:	<b>\$8.95</b>
Print Date:	06/09/2022	Total:	<b>\$8.95</b>
Ship Date:	06/10/2022		
Expected			
Delivery Date:	06/11/2022		

**From:** QC DEVELOPMENT  
5900 BALCONES DR STE 8148  
AUSTIN TX 78731-4257

**To:** MAYOR MICHAEL PASSERO  
CITY OF NEW LONDON  
181 STATE ST  
CC: FELIX J REYES, DEVT & PLANNING  
NEW LONDON CT 06320-6302

\* Retail Pricing Priority Mail rates apply. There is no fee for USPS Tracking® service on Priority Mail service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.

[Track Another Package +](#)

**Tracking Number:** 9405503699300269584883

[Remove X](#)

**Expected Delivery by**

**SATURDAY**

**11** JUNE  
2022 i by  
**9:00pm** i

**USPS Tracking Plus® Available** ▼

Feedback

**USPS in possession of item**

June 10, 2022 at 1:53 pm  
STORRS MANSFIELD, CT 06268

**Change Delivery Instructions** ▼

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**Text & Email Updates** ▼

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**Delivery Instructions** ▼

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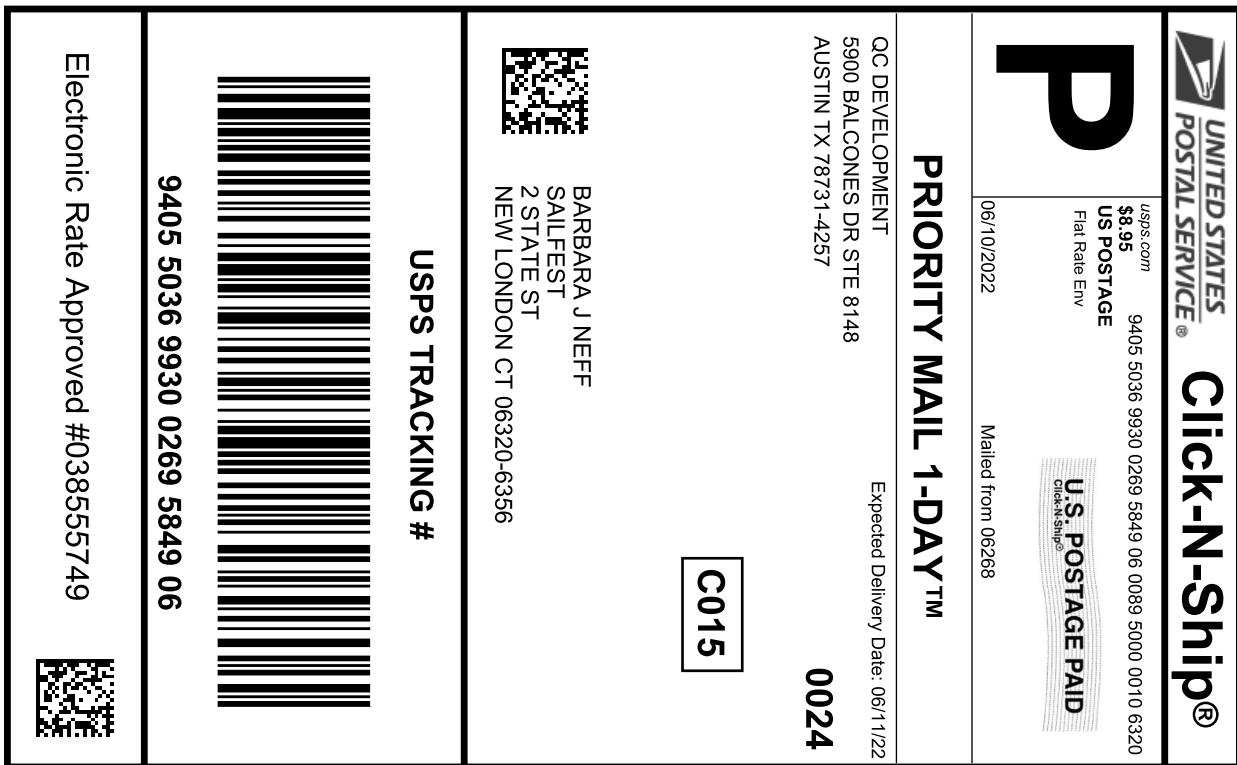
**Tracking History** ▼

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**USPS Tracking Plus®** ▼

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**Product Information** ▼



*Cut on dotted line.*

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3. Adhere your label to the package. A self-adhesive label is recommended. If tape or glue is used, DO NOT TAPE OVER BARCODE. Be sure all edges are secure.
4. To mail your package with PC Postage®, you may schedule a Package Pickup online, hand to your letter carrier, take to a Post Office™, or drop in a USPS collection box.
5. Mail your package on the "Ship Date" you selected when creating this label.

## Click-N-Ship® Label Record

**USPS TRACKING #:**  
**9405 5036 9930 0269 5849 06**

Trans. #:	565278519	Priority Mail® Postage:	<b>\$8.95</b>
Print Date:	06/09/2022	Total:	<b>\$8.95</b>
Ship Date:	06/10/2022		
Expected			
Delivery Date:	06/11/2022		

**From:** QC DEVELOPMENT  
5900 BALCONES DR STE 8148  
AUSTIN TX 78731-4257

**To:** BARBARA J NEFF  
SAILFEST  
2 STATE ST  
NEW LONDON CT 06320-6356

\* Retail Pricing Priority Mail rates apply. There is no fee for USPS Tracking® service on Priority Mail service with use of this electronic rate shipping label. Refunds for unused postage paid labels can be requested online 30 days from the print date.

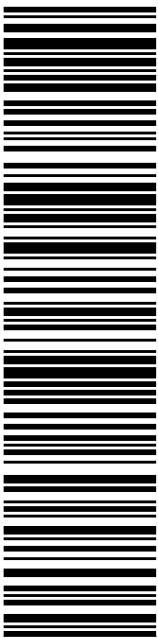


Thank you for shipping with the United States Postal Service!

Check the status of your shipment on the USPS Tracking® page at [usps.com](http://usps.com)

Electronic Rate Approved #038555749

**9405 5036 9930 0269 5849 06**



[Track Another Package +](#)

**Tracking Number:** 9405503699300269584906

[Remove X](#)

**Expected Delivery by**

**SATURDAY**

**11** JUNE  
2022 i by  
**9:00pm** i

**USPS Tracking Plus® Available** ▼

Feedback

**USPS in possession of item**

June 10, 2022 at 1:53 pm  
STORRS MANSFIELD, CT 06268

**Change Delivery Instructions** ▼

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**Text & Email Updates** ▼

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**Delivery Instructions** ▼

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**Tracking History** ▼

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**USPS Tracking Plus®** ▼

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**Product Information** ▼