



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

January 22, 2021

G. Scott Shepherd
Site Development Specialist II
SBA Communications Corporation
134 Flanders Road, Suite 125
Westborough, MA 01581

RE: **EM-T-MOBILE-104-201218** – T-Mobile notice of intent to modify an existing telecommunications facility located at 39 Maennerchor Avenue, Norwich, Connecticut.

Dear Mr. Shepherd:

The Connecticut Siting Council (Council) is in receipt of your correspondence of January 20, 2021 submitted in response to the Council's January 20, 2021 notification of an incomplete request for exempt modification with regard to the above-referenced matter.

The submission renders the request for exempt modification complete and the Council will process the request in accordance with the Federal Communications Commission 60-day timeframe.

Thank you for your attention and cooperation.

Sincerely,

s/Melanie A. Bachman

Melanie A. Bachman
Executive Director

MAB/IN/emr

From: Glenn Shepherd <GShepherd@sbsite.com>
Sent: Wednesday, January 20, 2021 2:31 PM
To: Robidoux, Evan <Evan.Robidoux@ct.gov>
Cc: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: RE: [External] Council Incomplete Letter for EM-T-MOBILE-104-201218 (39 Maennerchor Avenue, Norwich)

Evan, et al,

Please see the attached RF Report dated 11/25/20, which includes the Ericsson AIR 6449 B41 antennas, in accordance with the Notice of Incomplete (also attached for your reference).

This will complete the original CSC filing of 12/18/20 and satisfy the requirement of the Notice of Incomplete.

G. Scott Shepherd
Site Development Specialist II

508.251.0720 Ext.3807 + **T**
508.366.2610 + **F** + **F**
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**RADIO FREQUENCY EMISSIONS ANALYSIS REPORT
EVALUATION OF HUMAN EXPOSURE POTENTIAL
TO NON-IONIZING EMISSIONS**

T-Mobile Existing Facility

Site ID: CTNLI00G

**NLI00G_OptaMaennerchor_FT
39 Maennerchor Avenue
Norwich, Connecticut 06380**

November 25, 2020

EBI Project Number: 6220006016

Site Compliance Summary	
Compliance Status:	COMPLIANT
Site total MPE% of FCC general population allowable limit:	25.04%

November 25, 2020

T-Mobile

Attn: Jason Overbey, RF Manager

35 Griffin Road South

Bloomfield, Connecticut 06002

Emissions Analysis for Site: CTNLI00G - NLI00G_OptaMaennerchor_FT

EBI Consulting was directed to analyze the proposed T-Mobile facility located at **39 Maennerchor Avenue in Norwich, Connecticut** for the purpose of determining whether the emissions from the Proposed T-Mobile Antenna Installation located on this property are within specified federal limits.

All information used in this report was analyzed as a percentage of current Maximum Permissible Exposure (% MPE) as listed in the FCC OET Bulletin 65 Edition 97-01 and ANSI/IEEE Std C95.1. The FCC regulates Maximum Permissible Exposure in units of microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$). The number of $\mu\text{W}/\text{cm}^2$ calculated at each sample point is called the power density. The exposure limit for power density varies depending upon the frequencies being utilized. Wireless Carriers and Paging Services use different frequency bands each with different exposure limits; therefore, it is necessary to report results and limits in terms of percent MPE rather than power density.

All results were compared to the FCC (Federal Communications Commission) radio frequency exposure rules, 47 CFR 1.1307(b)(1) – (b)(3), to determine compliance with the Maximum Permissible Exposure (MPE) limits for General Population/Uncontrolled environments as defined below.

General population/uncontrolled exposure limits apply to situations in which the general population may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general population would always be considered under this category when exposure is not employment related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Public exposure to radio frequencies is regulated and enforced in units of microwatts per square centimeter ($\mu\text{W}/\text{cm}^2$). The general population exposure limits for the 600 MHz and 700 MHz frequency bands are approximately $400 \mu\text{W}/\text{cm}^2$ and $467 \mu\text{W}/\text{cm}^2$, respectively. The general population exposure limit for the 1900 MHz (PCS), 2100 MHz (AWS) and 11 GHz frequency bands is $1000 \mu\text{W}/\text{cm}^2$. Because each carrier will be using different frequency bands, and each frequency band has different exposure limits, it is necessary to report percent of MPE rather than power density.



Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.

Additional details can be found in FCC OET 65.

CALCULATIONS

Calculations were done for the proposed T-Mobile Wireless antenna facility located at 39 Maennerchor Avenue in Norwich, Connecticut using the equipment information listed below. All calculations were performed per the specifications under FCC OET 65. Since T-Mobile is proposing highly focused directional panel antennas, which project most of the emitted energy out toward the horizon, all calculations were performed assuming a lobe representing the maximum gain of the antenna per the antenna manufacturer's supplied specifications, minus 10 dB for directional panel antennas and 20 dB for highly focused parabolic microwave dishes, was focused at the base of the tower. For this report, the sample point is the top of a 6-foot person standing at the base of the tower.

For all calculations, all equipment was calculated using the following assumptions:

- 1) 2 LTE channels (600 MHz Band) were considered for each sector of the proposed installation. These Channels have a transmit power of 30 Watts per Channel.
- 2) 1 NR channel (600 MHz Band) was considered for each sector of the proposed installation. This Channel has a transmit power of 80 Watts.
- 3) 2 LTE channels (700 MHz Band) were considered for each sector of the proposed installation. These Channels have a transmit power of 30 Watts per Channel.
- 4) 4 GSM channels (PCS Band - 1900 MHz) were considered for each sector of the proposed installation. These Channels have a transmit power of 30 Watts per Channel.
- 5) 4 LTE channels (PCS Band - 1900 MHz) were considered for each sector of the proposed installation. These Channels have a transmit power of 60 Watts per Channel.



- 6) 2 LTE channels (AWS Band – 2100 MHz) were considered for each sector of the proposed installation. These Channels have a transmit power of 60 Watts per Channel.
- 7) 1 LTE channel (BRS Band - 2500 MHz) was considered for each sector of the proposed installation. This Channel has a transmit power of 120 Watts.
- 8) 1 NR channel (BRS Band - 2500 MHz) was considered for each sector of the proposed installation. This Channel has a transmit power of 120 Watts.
- 9) All radios at the proposed installation were considered to be running at full power and were uncombined in their RF transmissions paths per carrier prescribed configuration. Per FCC OET Bulletin No. 65 - Edition 97-01 recommendations to achieve the maximum anticipated value at each sample point, all power levels emitting from the proposed antenna installation are increased by a factor of 2.56 to account for possible in-phase reflections from the surrounding environment. This is rarely the case, and if so, is never continuous.
- 10) For the following calculations, the sample point was the top of a 6-foot person standing at the base of the tower. The maximum gain of the antenna per the antenna manufacturer's supplied specifications, minus 10 dB for directional panel antennas and 20 dB for highly focused parabolic microwave dishes, was used in this direction. This value is a very conservative estimate as gain reductions for these particular antennas are typically much higher in this direction.
- 11) The antennas used in this modeling are the Ericsson AIR 32 for the 1900 MHz / 1900 MHz / 2100 MHz channel(s), the RFS APXVAALL24_43-U-NA20 for the 600 MHz / 600 MHz / 700 MHz / 1900 MHz channel(s), the Ericsson AIR 6449 for the 2500 MHz / 2500 MHz channel(s) in Sector A, the Ericsson AIR 32 for the 1900 MHz / 1900 MHz / 2100 MHz channel(s), the RFS APXVAALL24_43-U-NA20 for the 600 MHz / 600 MHz / 700 MHz / 1900 MHz channel(s), the Ericsson AIR 6449 for the 2500 MHz / 2500 MHz channel(s) in Sector B, the Ericsson AIR 32 for the 1900 MHz / 1900 MHz / 2100 MHz channel(s), the RFS APXVAALL24_43-U-NA20 for the 600 MHz / 600 MHz / 700 MHz / 1900 MHz channel(s), the Ericsson AIR 6449 for the 2500 MHz / 2500 MHz channel(s) in Sector C. This is based on feedback from the carrier with regard to anticipated antenna selection. All Antenna gain values and associated transmit power levels are shown in the Site Inventory and Power Data table below. The maximum gain of the antenna per the antenna manufacturer's supplied specifications, minus 10 dB for directional panel antennas and 20 dB for highly focused parabolic microwave dishes, was used for all calculations. This value is a very conservative estimate as gain reductions for these particular antennas are typically much higher in this direction.



EBI Consulting

environmental | engineering | due diligence

- 12) The antenna mounting height centerline of the proposed antennas is 117 feet above ground level (AGL).
- 13) Emissions values for additional carriers were taken from the Connecticut Siting Council active database. Values in this database are provided by the individual carriers themselves.
- 14) All calculations were done with respect to uncontrolled / general population threshold limits.



T-Mobile Site Inventory and Power Data

Sector:	A	Sector:	B	Sector:	C
Antenna #:	1	Antenna #:	1	Antenna #:	1
Make / Model:	Ericsson AIR 32	Make / Model:	Ericsson AIR 32	Make / Model:	Ericsson AIR 32
Frequency Bands:	1900 MHz / 1900 MHz / 2100 MHz	Frequency Bands:	1900 MHz / 1900 MHz / 2100 MHz	Frequency Bands:	1900 MHz / 1900 MHz / 2100 MHz
Gain:	15.35 dBd / 15.35 dBd / 15.85 dBd	Gain:	15.35 dBd / 15.35 dBd / 15.85 dBd	Gain:	15.35 dBd / 15.35 dBd / 15.85 dBd
Height (AGL):	117 feet	Height (AGL):	117 feet	Height (AGL):	117 feet
Channel Count:	8	Channel Count:	8	Channel Count:	8
Total TX Power (W):	360 Watts	Total TX Power (W):	360 Watts	Total TX Power (W):	360 Watts
ERP (W):	12,841.53	ERP (W):	12,841.53	ERP (W):	12,841.53
Antenna A1 MPE %:	3.37%	Antenna B1 MPE %:	3.37%	Antenna C1 MPE %:	3.37%
Antenna #:	2	Antenna #:	2	Antenna #:	2
Make / Model:	RFS APXVAALL24_43-U-NA20	Make / Model:	RFS APXVAALL24_43-U-NA20	Make / Model:	RFS APXVAALL24_43-U-NA20
Frequency Bands:	600 MHz / 600 MHz / 700 MHz / 1900 MHz	Frequency Bands:	600 MHz / 600 MHz / 700 MHz / 1900 MHz	Frequency Bands:	600 MHz / 600 MHz / 700 MHz / 1900 MHz
Gain:	12.95 dBd / 12.95 dBd / 13.65 dBd / 15.45 dBd	Gain:	12.95 dBd / 12.95 dBd / 13.65 dBd / 15.45 dBd	Gain:	12.95 dBd / 12.95 dBd / 13.65 dBd / 15.45 dBd
Height (AGL):	117 feet	Height (AGL):	117 feet	Height (AGL):	117 feet
Channel Count:	7	Channel Count:	7	Channel Count:	7
Total TX Power (W):	320 Watts	Total TX Power (W):	320 Watts	Total TX Power (W):	320 Watts
ERP (W):	8,360.85	ERP (W):	8,360.85	ERP (W):	8,360.85
Antenna A2 MPE %:	3.70%	Antenna B2 MPE %:	3.70%	Antenna C2 MPE %:	3.70%
Antenna #:	3	Antenna #:	3	Antenna #:	3
Make / Model:	Ericsson AIR 6449	Make / Model:	Ericsson AIR 6449	Make / Model:	Ericsson AIR 6449
Frequency Bands:	2500 MHz / 2500 MHz	Frequency Bands:	2500 MHz / 2500 MHz	Frequency Bands:	2500 MHz / 2500 MHz
Gain:	22.05 dBd / 22.05 dBd	Gain:	22.05 dBd / 22.05 dBd	Gain:	22.05 dBd / 22.05 dBd
Height (AGL):	117 feet	Height (AGL):	117 feet	Height (AGL):	117 feet
Channel Count:	2	Channel Count:	2	Channel Count:	2
Total TX Power (W):	240 Watts	Total TX Power (W):	240 Watts	Total TX Power (W):	240 Watts
ERP (W):	38,477.89	ERP (W):	38,477.89	ERP (W):	38,477.89
Antenna A3 MPE %:	10.11%	Antenna B3 MPE %:	10.11%	Antenna C3 MPE %:	10.11%



Site Composite MPE %	
Carrier	MPE %
T-Mobile (Max at Sector A):	17.18%
Metro PCS	0.44%
AT&T	5.79%
Verizon	1.63%
Site Total MPE % :	25.04%

T-Mobile MPE % Per Sector	
T-Mobile Sector A Total:	17.18%
T-Mobile Sector B Total:	17.18%
T-Mobile Sector C Total:	17.18%
Site Total MPE % :	25.04%

T-Mobile Maximum MPE Power Values (Sector A)

T-Mobile Frequency Band / Technology (Sector A)	# Channels	Watts ERP (Per Channel)	Height (feet)	Total Power Density ($\mu\text{W}/\text{cm}^2$)	Frequency (MHz)	Allowable MPE ($\mu\text{W}/\text{cm}^2$)	Calculated % MPE
T-Mobile 1900 MHz GSM	4	1028.30	117.0	10.80	1900 MHz GSM	1000	1.08%
T-Mobile 1900 MHz LTE	2	2056.61	117.0	10.80	1900 MHz LTE	1000	1.08%
T-Mobile 2100 MHz LTE	2	2307.55	117.0	12.12	2100 MHz LTE	1000	1.21%
T-Mobile 600 MHz LTE	2	591.73	117.0	3.11	600 MHz LTE	400	0.78%
T-Mobile 600 MHz NR	1	1577.94	117.0	4.14	600 MHz NR	400	1.04%
T-Mobile 700 MHz LTE	2	695.22	117.0	3.65	700 MHz LTE	467	0.78%
T-Mobile 1900 MHz LTE	2	2104.51	117.0	11.05	1900 MHz LTE	1000	1.11%
T-Mobile 2500 MHz LTE	1	19238.94	117.0	50.53	2500 MHz LTE	1000	5.05%
T-Mobile 2500 MHz NR	1	19238.94	117.0	50.53	2500 MHz NR	1000	5.05%
						Total:	17.18%

• NOTE: Totals may vary by approximately 0.01% due to summation of remainders in calculations.



Summary

All calculations performed for this analysis yielded results that were **within** the allowable limits for general population exposure to RF Emissions.

The anticipated maximum composite contributions from the T-Mobile facility as well as the site composite emissions value with regards to compliance with FCC's allowable limits for general population exposure to RF Emissions are shown here:

T-Mobile Sector	Power Density Value (%)
Sector A:	17.18%
Sector B:	17.18%
Sector C:	17.18%
T-Mobile Maximum MPE % (Sector A):	17.18%
Site Total:	25.04%
Site Compliance Status:	COMPLIANT

The anticipated composite MPE value for this site assuming all carriers present is **25.04%** of the allowable FCC established general population limit sampled at the ground level. This is based upon values listed in the Connecticut Siting Council database for existing carrier emissions.

FCC guidelines state that if a site is found to be out of compliance (over allowable thresholds), that carriers over a 5% contribution to the composite value will require measures to bring the site into compliance. For this facility, the composite values calculated were well within the allowable 100% threshold standard per the federal government.