



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

November 9, 2021

Kristina Cottone
Real Estate Project Manager – AT&T New England
Smartlink
85 Rangeway Road
Building 3, Suite 102
Billerica, MA 01862
Kristina.cottone@smartlinkgroup.com

RE: **EM-AT&T-106-210922** - AT&T notice of intent to modify an existing telecommunications facility located at 226 Ferry Road, Old Saybrook, Connecticut.

Dear Ms. Cottone:

The Connecticut Siting Council (Council) is in receipt of your correspondence of November 8, 2021 submitted in response to the Council's November 2, 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,

A handwritten signature in black ink, appearing to read 'Melanie Bachman'.

Melanie Bachman
Executive Director

MAB/CW/laf

From: Kristina Cottone <kristina.cottone@smartlinkgroup.com>
Sent: Monday, November 8, 2021 1:17 PM
To: Walsh, Christina <Christina.Walsh@ct.gov>; Robidoux, Evan <Evan.Robidoux@ct.gov>
Cc: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: RE: Council Incomplete Letter for EM-AT&T-106-210922 (Ferry Road, Old Saybrook)

Hello Evan and Christina,

Please see attached EME report that now shows the Watts. (1) Hard copy will be put in FedEx this afternoon as well in response to the Incomplete letter. Please let me know if there's any other questions.

Thank you,

Kristina Cottone
Real Estate Project Manager- AT&T New England
Smartlink
c. 978-551-8627

From: Walsh, Christina <Christina.Walsh@ct.gov>
Sent: Tuesday, November 2, 2021 2:56 PM
To: Kristina Cottone <kristina.cottone@smartlinkgroup.com>; Robidoux, Evan <Evan.Robidoux@ct.gov>
Cc: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: Re: Council Incomplete Letter for EM-AT&T-106-210922 (Ferry Road, Old Saybrook)

Good afternoon, Kristina.

Page 6 "Antenna Inventory Table" appears to have copied the contents of the Antenna ID column into the Total ERP Power (Watts) column. Please see below.

Does this help clarify the confusion?

Thanks.

5. Antenna Inventory Table

Ant ID	Sector	Operator	Antenna manufacturer	Antenna Model	Operating Frequency/Technology	Rad Ctr (Ft)	Azi (Deg))	Total ERP Power (Watts)
1a	Alpha	AT&T	KMW	AM-X-CD-14-65-850	850	195	1000	1a
1b	Alpha	AT&T	KMW	AM-X-CD-14-65-1900	1900	195	3664	1b
2a	Alpha	AT&T	Commscope	NNH4-65A-R6-1900	1900	195	3664	2a
2b	Alpha	AT&T	Commscope	NNH4-65A-R6-2300	2300	195	1285	2b
3a	Alpha	AT&T	Commscope	DMP65R-BU4DA-700	700	195	1476	3a
3b	Alpha	AT&T	Commscope	DMP65R-BU4DA-850	850	195	1000	3b
3c	Alpha	AT&T	Commscope	DMP65R-BU4DA-2100	2100	195	3837	3c
3d	Alpha	AT&T	Commscope	DMP65R-BU4DA-850	850	195	1000	3d
4a	Beta	AT&T	KMW	AM-X-CD-14-65-850	850	195	1000	4a
4b	Beta	AT&T	KMW	AM-X-CD-14-65-1900	1900	195	3664	4b
5a	Beta	AT&T	Commscope	NNH4-65A-R6-1900	1900	195	3664	5a
5b	Beta	AT&T	Commscope	NNH4-65A-R6-2300	2300	195	1285	5b
6a	Beta	AT&T	Commscope	DMP65R-BU4DA-700	700	195	1476	6a
6b	Beta	AT&T	Commscope	DMP65R-BU4DA-850	850	195	1000	6b
6c	Beta	AT&T	Commscope	DMP65R-BU4DA-2100	2100	195	3837	6c
6d	Beta	AT&T	Commscope	DMP65R-BU4DA-850	850	195	1000	6d
7a	Gamma	AT&T	KMW	AM-X-CD-14-65-850	850	195	1000	7a
7b	Gamma	AT&T	KMW	AM-X-CD-14-65-1900	1900	195	3664	7b
8a	Gamma	AT&T	Commscope	NNH4-65A-R6-1900	1900	195	3664	8a
8b	Gamma	AT&T	Commscope	NNH4-65A-R6-2300	2300	195	1285	8b
9a	Gamma	AT&T	Commscope	DMP65R-BU4DA-700	700	195	1476	9a
9b	Gamma	AT&T	Commscope	DMP65R-BU4DA-850	850	195	1000	9b
9c	Gamma	AT&T	Commscope	DMP65R-BU4DA-2100	2100	195	3837	9c
9d	Gamma	AT&T	Commscope	DMP65R-BU4DA-850	850	195	1000	9d

1033 Watervliet Shaker Road, Albany, NY 12205

6

Thank you,

Christina Walsh
Supervising Siting Analyst
CT Siting Council

From: Kristina Cottone <kristina.cottone@smartlinkgroup.com>

Sent: Tuesday, November 2, 2021 2:12 PM

To: Robidoux, Evan <Evan.Robidoux@ct.gov>

Cc: CSC-DL Siting Council <Siting.Council@ct.gov>

Subject: RE: Council Incomplete Letter for EM-AT&T-106-210922 (Ferry Road, Old Saybrook)

Hi Evan,

Sorry, wrong attachment, please see this attachment for this site. Pages 6-7 has this measured in Watts. Please let me know how to proceed.

Thank you,

Kristina Cottone
Real Estate Project Manager- AT&T New England
Smartlink
c. 978-551-8627

From: Kristina Cottone

Sent: Tuesday, November 2, 2021 2:11 PM

To: Robidoux, Evan <Evan.Robidoux@ct.gov>

Cc: CSC-DL Siting Council <Siting.Council@ct.gov>

Subject: RE: Council Incomplete Letter for EM-AT&T-106-210922 (Ferry Road, Old Saybrook)

Importance: High

Hi Evan,

Can you please help clarify? The included and attached EME report has this ERP calculated in Watts. Is this what is being requested in the incomplete letter? Is something else being requested to be in Watts? Please see pages 7-9 of the attached.

Please let me know how to proceed.

Thank you,

Kristina Cottone

Real Estate Project Manager- AT&T New England

Smartlink

c. 978-551-8627

INFINIGY®

Non-Ionizing Radiation Report

Compiled For: Smartlink on behalf of AT&T

Site Name: Old Saybrook-RTE 81

Site FA: 10035291

USID: 59408

226 Ferry Road, Old Saybrook, CT 06475

Latitude: 41.3196589 Longitude: -72.3516100

Structure Type: Lattice Tower

Report Date: November 8, 2021



Status: AT&T will be compliant with FCC rules on RF Exposure.

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1. Executive Summary:

Smartlink on behalf of AT&T has contracted Infinigy Solutions, LLC to determine whether the site Old Saybrook-RTE 81 located at 226 Ferry Road in Old Saybrook, CT Will Be Compliant with all Federal Communications Commission (FCC) rules and regulations for radio frequency (RF) exposure as indicated in **47CFR§1.1310**.

The report incorporates a theoretical RF field analysis in accordance with the FCC Rules and Regulations for all individuals classified as “Occupational or Controlled” and “General Public or Uncontrolled” (see Appendix A and B).

This document and the conclusions herein are based on information provided by AT&T.

As a result of the analysis, **AT&T Will Be Compliant with FCC rules.**

Site Cumulative Exposure %		
Uncontrolled / General Population	Exposure values at the site (mW/cm ²)	0.0112
	% Exposure	1.548%
Controlled / Occupational	Exposure values at the site (mW/cm ²)	0.0112
	% Exposure	0.317%

2. Site Summary:

Site Information	
Site Name: Old Saybrook-RTE 81	
Site Address: 226 Ferry Road, Old Saybrook, CT 06475	
Site Type: Lattice Tower	
Compliance Status	Will Be Compliant
Mitigation Required	No
Signage Required	Yes
Barriers Required	No
Access Locked	No
Area Controlled or Uncontrolled	Uncontrolled

3. Site Compliance

This report also incorporates overview of the site information:

- Antenna Inventory Table
- Calculation Tables showing exposure for each carrier transmit frequency
- Total exposure for all carriers existing and proposed at ground level considering the centerline of all antennas and horizontal distance from the tower.
- Maximum Effective Radiated Power Assumed as Worst Case for Calculations used in this study
- Calculations based on flat ground around base of the structure

4. Site Compliance Recommendations

Infinigy recommends the following upon the installation of antennas at the site:

Base of tower

Install a Yellow Caution 2 sign at the base of the tower (if none currently exists)

5. Antenna Inventory Table

Ant ID	Sector	Operator	Antenna manufacturer	Antenna Model	Operating Frequency/Technology	Rad Ctr (Ft)	Az (Deg)	Total ERP Power (Watts)
1a	Alpha	AT&T	KMW	AM-X-CD-14-65-850	850	195	143	1000
1b	Alpha	AT&T	KMW	AM-X-CD-14-65-1900	1900	195	143	3664
2a	Alpha	AT&T	Commscope	NNH4-65A-R6-1900	1900	195	23	3664
2b	Alpha	AT&T	Commscope	NNH4-65A-R6-2300	2300	195	23	1285
3a	Alpha	AT&T	Commscope	DMP65R-BU4DA-700	700	195	23	1476
3b	Alpha	AT&T	Commscope	DMP65R-BU4DA-850	850	195	23	1000
3c	Alpha	AT&T	Commscope	DMP65R-BU4DA-2100	2100	195	23	3837
3d	Alpha	AT&T	Commscope	DMP65R-BU4DA-850	850	195	23	1000
4a	Beta	AT&T	KMW	AM-X-CD-14-65-850	850	195	263	1000
4b	Beta	AT&T	KMW	AM-X-CD-14-65-1900	1900	195	263	3664
5a	Beta	AT&T	Commscope	NNH4-65A-R6-1900	1900	195	143	3664
5b	Beta	AT&T	Commscope	NNH4-65A-R6-2300	2300	195	143	1285
6a	Beta	AT&T	Commscope	DMP65R-BU4DA-700	700	195	143	1476
6b	Beta	AT&T	Commscope	DMP65R-BU4DA-850	850	195	143	1000
6c	Beta	AT&T	Commscope	DMP65R-BU4DA-2100	2100	195	143	3837
6d	Beta	AT&T	Commscope	DMP65R-BU4DA-850	850	195	143	1000
7a	Gamma	AT&T	KMW	AM-X-CD-14-65-850	850	195	23	1000
7b	Gamma	AT&T	KMW	AM-X-CD-14-65-1900	1900	195	23	3664
8a	Gamma	AT&T	Commscope	NNH4-65A-R6-1900	1900	195	263	3664
8b	Gamma	AT&T	Commscope	NNH4-65A-R6-2300	2300	195	263	1285
9a	Gamma	AT&T	Commscope	DMP65R-BU4DA-700	700	195	263	1476
9b	Gamma	AT&T	Commscope	DMP65R-BU4DA-850	850	195	263	1000
9c	Gamma	AT&T	Commscope	DMP65R-BU4DA-2100	2100	195	263	3837
9d	Gamma	AT&T	Commscope	DMP65R-BU4DA-850	850	195	263	1000

INFINIGY

Ant ID	Sector	Operator	Antenna manufacturer	Antenna Model	Operating Frequency/Technology	Rad Ctr (Ft)	Az (Deg)	Total ERP Power (Watts)
10a	Alpha	T-Mobile	Commscope	FFHH-65A-R3-600	600	150	0	759
10b	Alpha	T-Mobile	Commscope	FFHH-65A-R3-700	700	150	0	833
10c	Alpha	T-Mobile	Commscope	FFHH-65A-R3-600	1900	150	0	609
10d	Alpha	T-Mobile	Commscope	FFHH-65A-R3-2100	2100	150	0	1859
11a	Alpha	T-Mobile	RFS	TMBXX-6516-A2M-1900	1900	150	0	2112
11b	Alpha	T-Mobile	RFS	TMBXX-6516-A2M-1900	2100	150	0	3058
12a	Beta	T-Mobile	Commscope	FFHH-65A-R3-600	600	150	120	759
12b	Beta	T-Mobile	Commscope	FFHH-65A-R3-700	700	150	120	833
12c	Beta	T-Mobile	Commscope	FFHH-65A-R3-600	1900	150	120	609
12d	Beta	T-Mobile	Commscope	FFHH-65A-R3-2100	2100	150	120	1859
13a	Beta	T-Mobile	RFS	TMBXX-6516-A2M-1900	1900	150	120	2112
13b	Beta	T-Mobile	RFS	TMBXX-6516-A2M-1900	2100	150	120	3058
14a	Gamma	T-Mobile	Commscope	FFHH-65A-R3-600	600	150	240	759
14b	Gamma	T-Mobile	Commscope	FFHH-65A-R3-700	700	150	240	833
14c	Gamma	T-Mobile	Commscope	FFHH-65A-R3-600	1900	150	240	609
14d	Gamma	T-Mobile	Commscope	FFHH-65A-R3-2100	2100	150	240	1859
15a	Gamma	T-Mobile	RFS	TMBXX-6516-A2M-1900	1900	150	240	2112
15b	Gamma	T-Mobile	RFS	TMBXX-6516-A2M-1900	2100	150	240	3058

6. RF Guidelines

To ensure safety of company workers, the following points need to be taken into consideration and implemented at wireless sites in accordance with the Carriers policies:

- a) **Worksite:** Any employee at the site should avoid working directly in front of the antenna or in areas predicted to exceed general population exposure limits by 100%. Workers should insist that the transmitters be switched off during the work period.
- b) **RF Safety Training and Awareness:** All employees working in areas exceeding the general population limits should have a basic awareness of RF safety measures. Videos, classroom lectures and online courses are all appropriate training methods on these topics.
- c) **Site Access:** Restricting access to transmitting antenna locations is one of the most important elements of RF safety. This can be done with:
 - Locked doors/gates/ladder access
 - Alarmed doors
 - Restrictive barriers
- d) **Three-foot Buffer:** There is an inverse relationship between the strength of the field and the distance from the antenna. The RF field diminishes with distance from the antenna. Workers should maintain a three-foot distance from the antennas.
- e) **Antennas:** Workers should always assume that the antenna is transmitting and should never stop right in front of the antenna. If someone must pass by an antenna, he/she should move quickly, thus reducing RF exposure.

Attachment 1: Site Exposure Analysis Per Carrier

AT&T All Bands		
Uncontrolled / General Population	Exposure values at the site (mW/cm ²)	0.0068
	% Exposure	0.819%
Controlled / Occupational	Exposure values at the site (mW/cm ²)	0.0068
	% Exposure	0.169%

T-Mobile All Bands		
Uncontrolled / General Population	Exposure values at the site (mW/cm ²)	0.0045
	% Exposure	0.729%
Controlled / Occupational	Exposure values at the site (mW/cm ²)	0.0055
	% Exposure	0.148%

Attachment 2: AT&T Exposure Analysis Per Band

AT&T 700 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	0.5
	Exposure values at the site (mW/cm ²)	0.0007
	% Exposure	0.13%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	2.3
	Exposure values at the site (mW/cm ²)	0.0007
	% Exposure	0.03%

AT&T 850 MHz UMTS		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	0.6
	Exposure values at the site (mW/cm ²)	0.0004
	% Exposure	0.07%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	2.8
	Exposure values at the site (mW/cm ²)	0.0004
	% Exposure	0.02%

AT&T 850 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	0.6
	Exposure values at the site (mW/cm ²)	0.0004
	% Exposure	0.07%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	2.8
	Exposure values at the site (mW/cm ²)	0.0004
	% Exposure	0.02%

AT&T 850 MHz 5G		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	0.6
	Exposure values at the site (mW/cm ²)	0.0003
	% Exposure	0.05%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	2.8
	Exposure values at the site (mW/cm ²)	0.0003
	% Exposure	0.01%

AT&T 1900 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	1.0
	Exposure values at the site (mW/cm ²)	0.0032
	% Exposure	0.32%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	5.0
	Exposure values at the site (mW/cm ²)	0.0032
	% Exposure	0.06%

AT&T 2100 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	1.0
	Exposure values at the site (mW/cm ²)	0.0011
	% Exposure	0.11%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	5.0
	Exposure values at the site (mW/cm ²)	0.0011
	% Exposure	0.0226%

AT&T 2300 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	1.0
	Exposure values at the site (mW/cm ²)	0.0006
	% Exposure	0.06%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	5.0
	Exposure values at the site (mW/cm ²)	0.0006
	% Exposure	0.01%

Attachment 3: T-Mobile Exposure Analysis Per Band

T-Mobile 600 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	0.2
	Exposure values at the site (mW/cm ²)	0.0006
	% Exposure	0.27542%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	1.0
	Exposure values at the site (mW/cm ²)	0.0006
	% Exposure	0.055%

T-Mobile 700 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	0.5
	Exposure values at the site (mW/cm ²)	0.0006
	% Exposure	0.12%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	2.3
	Exposure values at the site (mW/cm ²)	0.0006
	% Exposure	0.03%

T-Mobile 1900 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	1.0
	Exposure values at the site (mW/cm ²)	0.0004
	% Exposure	0.04%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	5.0
	Exposure values at the site (mW/cm ²)	0.0004
	% Exposure	0.01%

T-Mobile 2100 MHz LTE		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	1.0
	Exposure values at the site (mW/cm ²)	0.0013
	% Exposure	0.13%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	5.0
	Exposure values at the site (mW/cm ²)	0.0013
	% Exposure	0.03%

T-Mobile 1900 MHz GSM		
Uncontrolled / General Population	FCC's exposure limits (mW/cm ²)	1.0
	Exposure values at the site (mW/cm ²)	0.0015
	% Exposure	0.15%
Controlled / Occupational	FCC's Exposure limits(mW/cm ²)	5.0
	Exposure values at the site (mW/cm ²)	0.0015
	% Exposure	0.03%

7. Appendix A: FCC Guidelines

FCC Policies

The Federal Communications Commission (FCC) in 1996 implemented regulations and policies for analysis of RF propagation to evaluate RF emissions. All the analysis and results of this report are compared with FCC's (Federal Communications Commission) rules to determine whether a site is compliant for Occupational/Controlled or General Public/Uncontrolled exposure. All the analysis of RF propagation is done in terms of a percentage. The limits primarily indicate the power density and are generally expressed in terms of milliwatts per centimeter square, mW/cm².

FCC guidelines incorporate two separate tiers of exposure limits that are dependent on the scenario/ situation in which that exposure takes place or the status of the individuals who are subjected to that exposure. The decision as to which tier is applied to a scenario is based on the following definitions:

Occupational / Controlled

These limits apply in situations when someone is exposed to RF energy through his/her occupation, is fully aware of the harmful effects of the RF exposure and has an ability to exercise control over this exposure. Occupational / controlled exposure limits also apply when 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. limits for Occupational/Controlled exposure can be found on Table 1(A).

General Population / Uncontrolled

These limits apply to situations in which the general public may be exposed or in which persons who are exposed because of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure to RF. Therefore, members of the general public would always be considered under this category, for example, in the case of a telecommunications tower that exposes people in a nearby residential area. Exposure limits for General Population/Uncontrolled can be found on Table 1(B).

Table 1. LIMITS FOR MAXIMUM PERMISSIBLE EXPOSURE (MPE)

(A) Limits for Occupational/Controlled Exposure

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

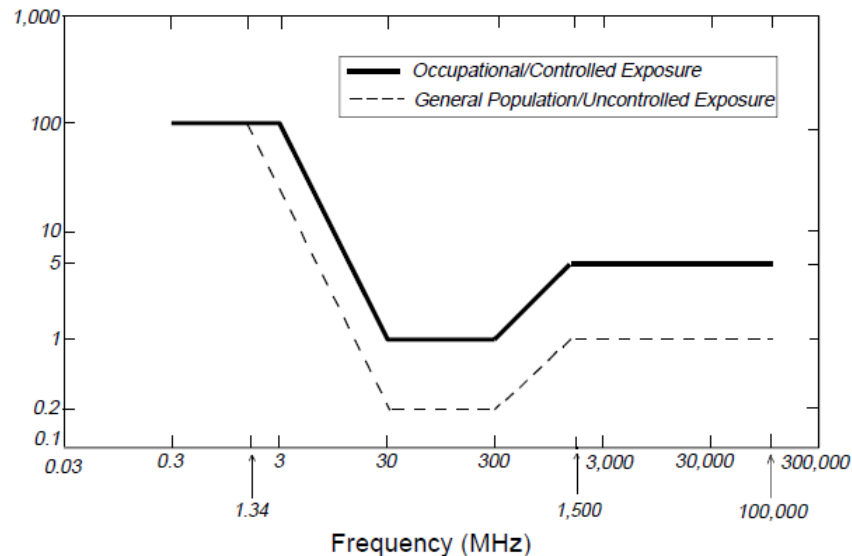
(B) Limits for General Population/Uncontrolled Exposure

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time E ² , H ² or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f ²)*	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

Figure 1. FCC Limits for Maximum Permissible Exposure (MPE)
Plane-wave Equivalent Power Density



OSHA Statement:

The objective of the OSHA Act is to ensure the safety and health of the working men and women by enforcing certain standards. The act also assists and encourages the states in their efforts to ensure safe and healthy working conditions through means of research, information, education and training in the field of occupational safety and health and for other purposes.

According to OSHA Act section 5, important duties to be considered are:

(a) Each employer

- 1) Shall furnish to each of his employees' employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious harm to his employees
- 2) Shall comply with occupational safety and health standards promulgated under this act.

(b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

8. Appendix B: Preparer Certification

I, Tim Harris, preparer of this report, certify that I am fully trained and aware of the rules and regulations of both the Federal Communications Commission and the Occupational Safety and Health Administration regarding Human Exposure to Radio Frequency Radiation. In addition, I have been trained in 1) RF safety and 2) RF modeling using RoofView modeling software.

I certify that the information contained in this report is true and correct to the best of my knowledge.

Timothy A. Harris

11/8/2021

Signature

Date

