



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

August 1, 2023

Kristen Motel, Esq.
Cuddy + Feder, LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
kmotel@cuddyfeder.com

RE: TS-ATT-106-230713 – AT&T request for an order to approve tower sharing at an existing telecommunications facility located at 40 River Street, Old Saybrook, Connecticut

Dear Attorney Motel:

The Connecticut Siting Council (Council) received the tower share request for the above-referenced facility on July 13, 2023

According to Section 16-50j-90 of the Regulations of Connecticut State Agencies, “no tower share application shall be approved until a complete application containing all information deemed relevant by the Council has been filed. Relevant information shall at a minimum include that listed in Section 16-50j-89 of the Regulations of Connecticut State Agencies...”

Staff has reviewed this tower share request for completeness and has identified the following deficiencies:

1. On September 23, 2022, the Council issued a memorandum to telecommunications industry representatives requiring a cumulative far-field Radio Frequency Power Density Analysis including all entities located on the tower to be provided with all telecommunications tower share requests. The radio frequency (RF) analysis dated February 28, 2023 provided with the request includes far-field analysis for AT&T only. A copy of the memorandum is available on the Council’s website at the following link: [20220923-farfieldmemo_final.pdf \(ct.gov\)](http://portal.ct.gov/esc/20220923-farfieldmemo_final.pdf).
2. The tower share request lacks documentation of the original facility approval and any conditions of such approval or correspondence with the Town of Old Saybrook stating that the town no longer retains records of its decision.

Therefore, the tower share request is incomplete at this time. The Council recommends that AT&T provide 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 provide documentation showing the original facility approval with conditions if any or correspondence with the Town stating that there are no records of the original facility approval on or before September 1, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to September 1, 2023. **Please provide an electronic version and one hard copy of the requested information for the incomplete tower share filing to be rendered complete and processed. Please include the Council’s tower share 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 cursive script, appearing to read "Melanie A. Bachman".

Melanie A. Bachman
Executive Director

MAB/ANM/dll