STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL
Ten Franklin Square, New Britain, CT 06051
Phone: (860) 827-2935 Fax: (860) 827-2950
E-Mail: siting.council@ct.gov
www.ct.gov/csc

July 9, 2012

Julie D. Kohler, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604

RE: **EM-T-MOBILE-107-120614B** - Omnipoint Communications, as subsidiary of T-Mobile USA, Inc., notice of intent to modify an existing telecommunications facility located at 26 South Orange Center Road, Orange, Connecticut.

Dear Attorney Kohler:

The Connecticut Siting Council (Council) hereby acknowledges your notice to modify this existing telecommunications facility, pursuant to Section 16-50j-73 of the Regulations of Connecticut State Agencies with the following conditions:

- Any deviation from the proposed modification as specified in this notice and supporting materials with Council shall render this acknowledgement invalid;
- Any material changes to this modification as proposed shall require the filing of a new notice with the Council;
- Not less than 45 days after completion of construction, the Council shall be notified in writing that construction has been completed;
- The validity of this action shall expire one year from the date of this letter; and
- The applicant may file a request for an extension of time beyond the one year deadline provided that such request is submitted to the Council not less than 60 days prior to the expiration;

The proposed modifications including the placement of all necessary equipment and shelters within the tower compound are to be implemented as specified here and in your notice dated June 13, 2012. The modifications are in compliance with the exception criteria in Section 16-50j-72 (b) of the Regulations of Connecticut State Agencies as changes to an existing facility site that would not increase tower height, extend the boundaries of the tower site, increase noise levels at the tower site boundary by six decibels, and increase the total radio frequencies electromagnetic radiation power density measured at the tower site boundary to or above the standard adopted by the State Department of Environmental Protection pursuant to General Statutes § 22a-162. This facility has also been carefully modeled to ensure that radio frequency emissions are conservatively below State and federal standards applicable to the frequencies now used on this tower.

This decision is under the exclusive jurisdiction of the Council. Please be advised that the validity of this action shall expire one year from the date of this letter. Any additional change to this facility will require explicit notice to this agency pursuant to Regulations of Connecticut State Agencies Section 16-50j-73. Such notice shall include all relevant information regarding the proposed change with cumulative worst-case modeling of radio frequency exposure at the closest point of uncontrolled access to the tower base, consistent with Federal Communications Commission, Office of Engineering and Technology, Bulletin 65. Thank you for your attention and cooperation.

Very truly yours,

LRoberts
Linda Roberts
Executive Director

LR/CDM/jbw

c: The Honorable James M. Zeoli, First Selectman, Town of Orange
Paul Dinice, Zoning Enforcement Officer, Town of Orange

CSC
CONNECTICUT SITING COUNCIL

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June 18, 2012

The Honorable James M. Zeoli
First Selectman
Town of Orange
Town Hall
617 Orange Center Road
Orange, CT 06477-2423

RE: **EM-T-MOBILE-107-120614B** - Omnipoint Communications, as subsidiary of T-Mobile USA, Inc., notice of intent to modify an existing telecommunications facility located at 26 South Orange Center Road, Orange, Connecticut.

Dear First Selectman Zeoli:

The Connecticut Siting Council (Council) received this request to modify an existing telecommunications facility, pursuant to Regulations of Connecticut State Agencies Section 16-50j-72.

If you have any questions or comments regarding this proposal, please call me or inform the Council by July 2, 2012.

Thank you for your cooperation and consideration.

Very truly yours,

LRoberts

Linda Roberts
Executive Director

LR/jbw

Enclosure: Notice of Intent

c: Paul Dinice, Zoning Enforcement Officer, Town of Orange

CSC
CONNECTICUT SITING COUNCIL

COHEN and WOLF P.C.
ATTORNEYS AT LAW

EM-T-MOBILE-107-120614B

JULIE D. KOHLER

PLEASE REPLY TO: Bridgeport
WRITER'S DIRECT DIAL: (203) 337-4157
E-Mail Address: jkohler@cohenandwolf.com

June 13, 2012 ORIGINAL

Ms. Linda Roberts,
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Notice of Exempt Modification
Town of Orange/T-Mobile co-location
Site ID CT11720A
26 South Orange Center Road, Orange CT

Dear Ms. Roberts:

This office represents T-Mobile Northeast LLC ("T-Mobile") and has been retained to file exempt modification filings with the Connecticut Siting Council on its behalf.

In this case, the Town of Orange owns the existing telecommunications tower and related facility at 26 South Orange Center Road, Orange Connecticut (latitude 41.25572, longitude -73.0182). T-Mobile intends to replace six antennas and related equipment at this existing facility in Orange ("Orange Facility"). Please accept this letter as notification, pursuant to R.C.S.A. § 16-50j-73, of construction which constitutes an exempt modification pursuant to R.C.S.A. § 16-50j-72(b)(2). In accordance with R.C.S.A. § 16-50j-73, a copy of this letter is being sent to the First Selectman, James Zeoli.

The existing Orange Facility consists of a 177 foot tower. The tower currently supports the antennas of AT&T (EM-AT&T-168-107-049-027-030903), Verizon (TS-VER-107-020508), Sprint (TS-SPRINT-107-010831) and T-Mobile (TS-T-MOBILE-107-050713).

T-Mobile plans to replace six antenna mounted on the tower at a centerline of 150 feet. T-Mobile will also install equipment cabinets on a concrete pad within the existing compound area near the base of the tower (See the plans dated April 4, 2012 attached hereto as Exhibit A). The existing tower is structurally capable of supporting T-Mobile' proposed use, as indicated in the structural analysis dated April 18, 2012 and attached hereto as Exhibit B.

The planned modifications to the Orange Facility fall squarely within those activities explicitly provided for in R.C.S.A. § 16-50j-72(b)(2).

1. The proposed modification will not increase the height of the tower. T-Mobile's replacement antennas will be installed at the 150 foot level. The enclosed tower drawing confirms that the proposed modification will not increase the height of the tower.

2. The installation of the T-Mobile replacement equipment in the existing compound, as reflected on the attached site plan, will not require an extension of the site boundaries. T-Mobile's proposed equipment will be located entirely within the existing compound area.

3. The proposed modification to the Facility will not increase the noise levels at the existing facility by six decibels or more.

4. The operation of the replacement antennas will not increase the total radio frequency (RF) power density, measured at the base of the tower, to a level at or above the applicable standard. According to a RF Exposure Analysis prepared by EBI dated June 11, 2012 T-Mobile' operations would add 0.503% of the FCC Standard. Therefore, the calculated "worst case" power density for the planned combined operation at the site including all of the proposed antennas would be 36.763% of the FCC Standard as calculated for a mixed frequency site as evidenced by the engineering exhibit attached hereto as Exhibit C.

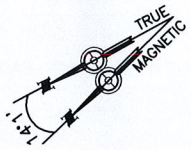
For the foregoing reasons, T-Mobile respectfully submits that the proposed replacement antennas and equipment at the Orange Facility constitutes an exempt modification under R.C.S.A. § 16-50j-72(b)(2).

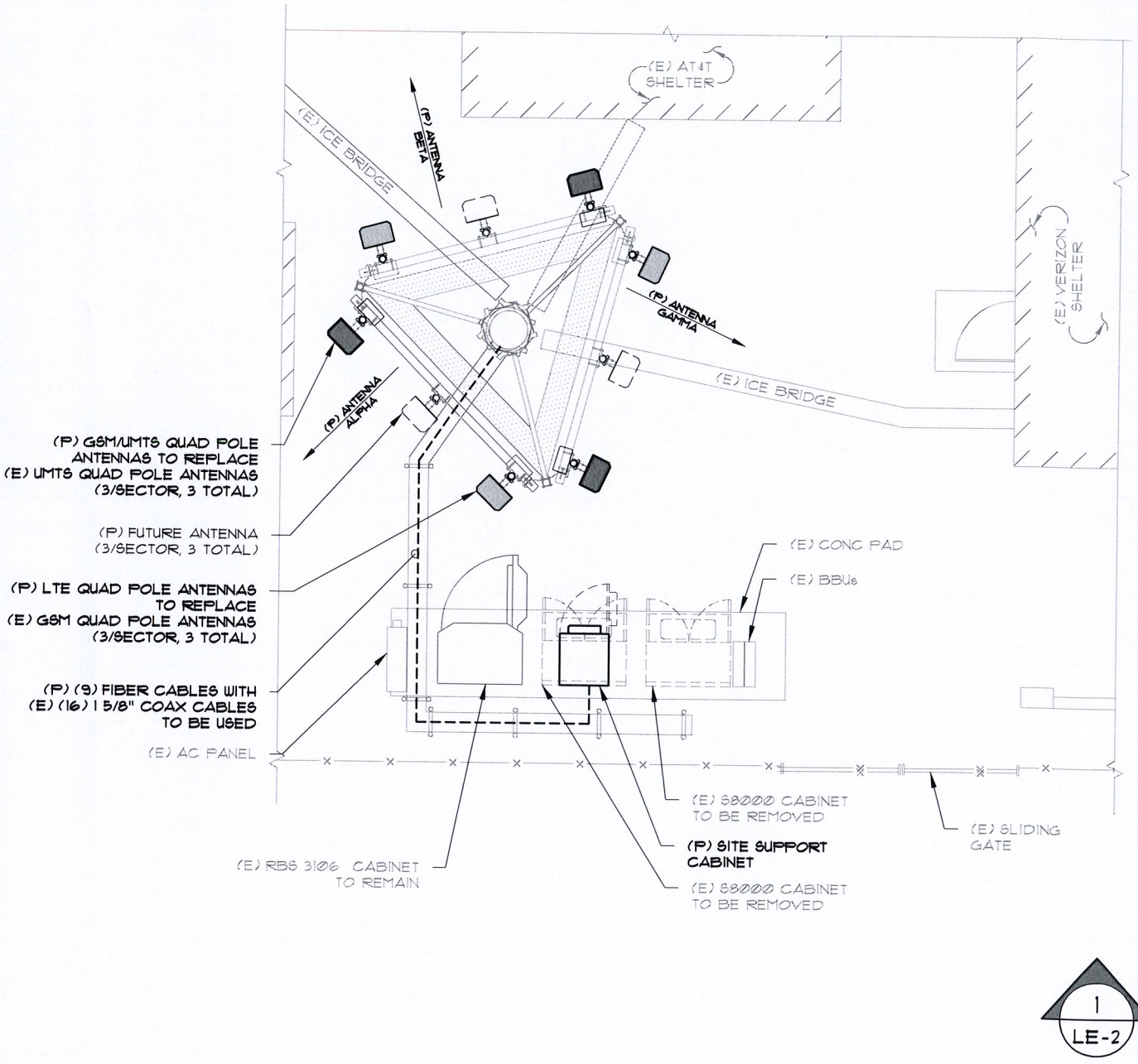
Sincerely,

Julie D. Kohler, Esq.

cc: First Selectman James Zeoli, Town of Orange
Mark Richard, T-Mobile
Scott Chase, Northeast Site Solutions

EXHIBIT A





1
LE-2

ALL EQUIPMENT LOCATIONS ARE APPROXIMATE AND ARE SUBJECT TO APPROVAL BY LESSEE/LICENSEE'S STRUCTURAL & RF ENGINEERS. LOCATIONS OF POWER & TELEPHONE FACILITIES ARE SUBJECT TO APPROVAL BY UTILITY COMPANIES.

COMPOUND PLAN

N.T.S.

1
LE-1

Configuration

2C

SUBMITTALS	
LE REV A	04.04.12

ATLANTIS GROUP
1340 Centre Street
Suite 203
Newton, MA 02459
Office: 617-965-0789
Fax: 617-213-5056

LEASE EXHIBIT

SITE NUMBER:
CT11720A

SITE NAME:
MILFORD

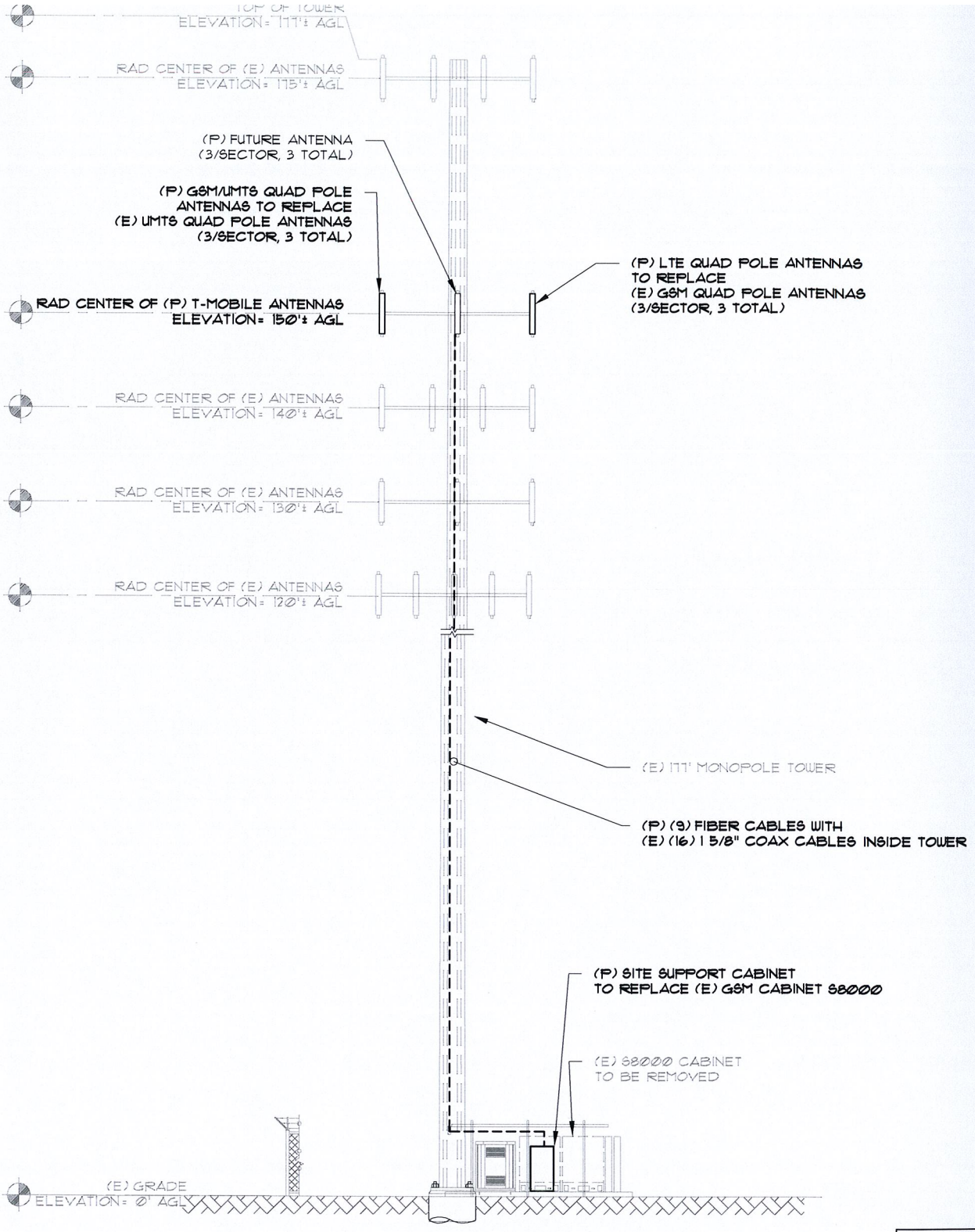
SITE ADDRESS:
26 SO. ORANGE CENTER ROAD
ORANGE, CT 06477

NORTHEAST TOWERS
199 BRICKYARD ROAD
FARMINGTON, CT 06032
OFFICE: (860) 677-1999

FOR

T-MOBILE NORTHEAST, LLC
35 GRIFFIN ROAD SOUTH
BLOOMFIELD, CT 06002
OFFICE: (860) 692-7100
FAX: (860) 692-7159

DRAWN BY: SB | CHECKED BY: SM



EAST ELEVATION

N.T.S

1
LE-2

Configuration

2C

SUBMITTALS	
LE REV A	04.04.12

ATLANTIS GROUP
1340 Centre Street
Suite 203
Newton, MA 02459
Office: 617-965-0789
Fax: 617-213-5056

LEASE EXHIBIT

SITE NUMBER:
CT11720A

SITE NAME:
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OFFICE: (860) 692-7100
FAX: (860) 692-7159

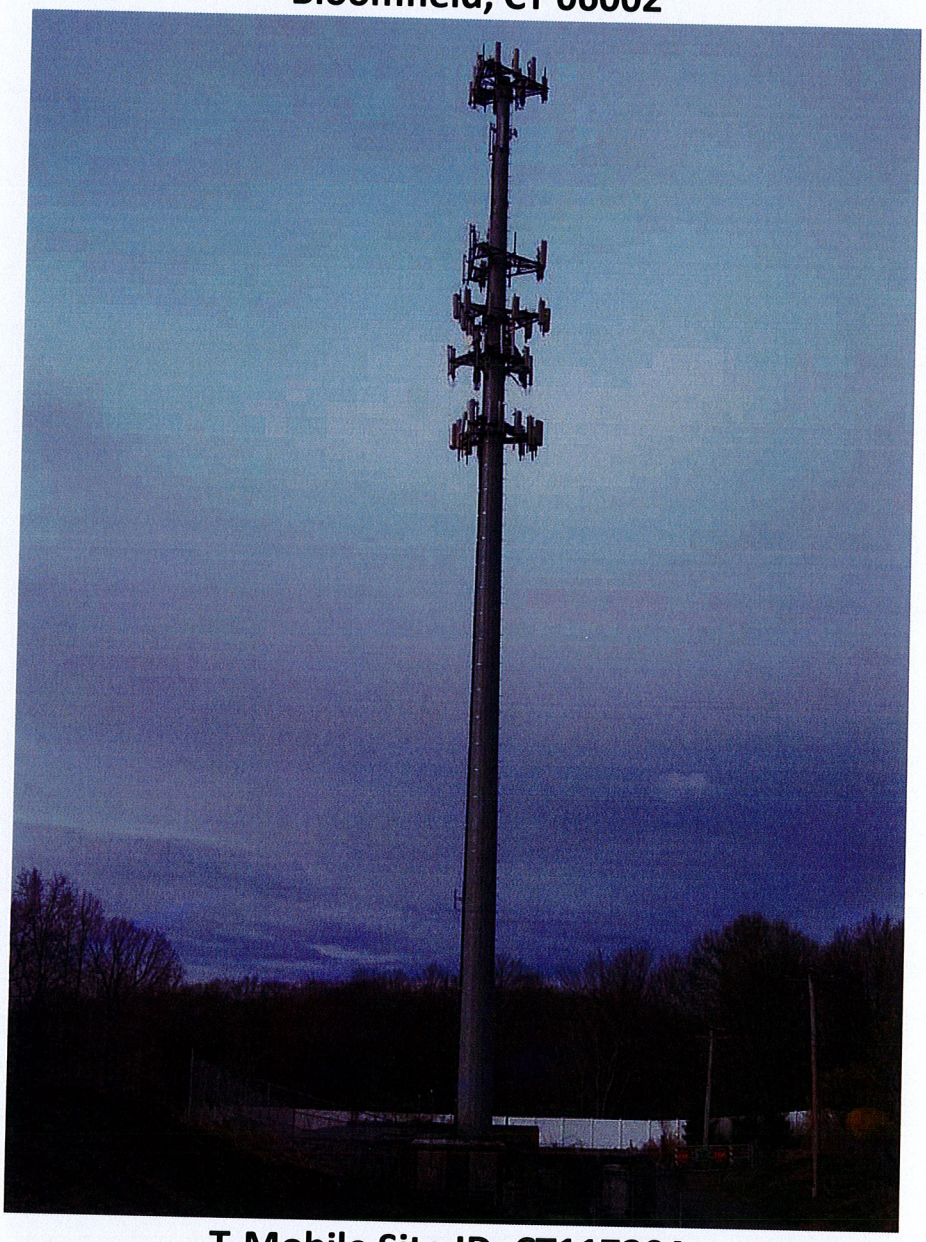
DRAWN BY: SB | CHECKED BY: SM

EXHIBIT B

STRUCTURAL ANALYSIS REPORT
MONOPOLE

Prepared For:

35 Griffin Road South
Bloomfield, CT 06002



T-Mobile Site ID: CT11720A
T-Mobile Site Name: CT720/Town of Orange_MP
26 South Orange Center Road, Orange, CT 06477

Prepared By:
Atlantis Group, Inc.
1340 Centre Street, Suite 203
Newton, Massachusetts 02459
Phone: 617-965-0789, Fax: 617-965-0103

1.0 SUBJECT AND REFERENCES

The purpose of this analysis is to evaluate the structural capacity of the existing 180 feet high monopole located at 26 South Orange Center Road, Orange, CT 06477, for the addition and alteration of wireless telecommunication appurtenances proposed by T-Mobile.

The structural analysis is based on the following documentation:

- Monopole Structural Analysis Report prepared by Bay State Design, Inc., dated 12/12/2008, which includes a prior analysis by PJF.
- Antenna information provided by T-Mobile.

1.1 STRUCTURE

The monopole is formed by the following sections:

Section Length (ft)	Lap Splice (in)	Shaft Thickness (in)	Top Dia/Bottom Dia (in/in)	Steel Yield Strength (ksi)
12.84	41	0.1875	24.0000/26.2500	65
52.75	57	0.2500	25.2757/36.5250	65
54.00	72	0.3125	35.0120/46.3570	65
54.56	79	0.3750	44.4714/55.7650	65
26.58		0.4375	53.6571/64.7500	65

- The pole is 18-sided and connected to the foundation with anchor bolts and a base plate.

2.0 EXISTING AND PROPOSED APPURTENANCES

The analysis is based on the following existing and proposed appurtenances:

Existing Appurtenances by Others

CARRIER	RAD CENTER (FT)	ANTENNA & TMA	COAX	MOUNT
AT&T	180	(6) EMSRR90-17-02DP (3) 776QNB120EXM	(24) 1 5/8" (3) 1 1/2" Inside Shaft	Low Profile Platform
-	170	(3) Panel Antennas	(6) 1 5/8" Inside Shaft	(3) Flush Mounts
Nextel	139	(12) DB844H80-XY	(12) 1 5/8" Inside Shaft	Low Profile Platform

Existing Appurtenances by Others - Continued

CARRIER	RAD CENTER (FT)	ANTENNA & TMA	COAX	MOUNT
Sprint	130	(12) DB983H65A-M	(12) 1 5/8" Inside Shaft	Low Profile Platform
Verizon	119	(12) DB846H90-SX	(12) 1 5/8" Inside Shaft	Low Profile Platform

Existing Configuration of T-MOBILE Appurtenances:

Rad Center (ft)	Antenna & TMA		Mount	Coax
150	UMTS Antenna GSM Antenna TMA	(3) PX16DWV_16DWVS (3) APX16PV_16PVL (3) dd B4 & (3) dd B2	Low Profile Platform	(24) 1 5/8" Inside Shaft

Proposed Configuration of T-MOBILE Appurtenances:

Rad Center (ft)	Antenna & TMA		Mount	Coax
150	GSM/UMTS LTE QUAD POLE LTE QUAD POLE TMA	(3) AIR21 B2A/B4P (3) AIR21 B4A/B2P (3) dd B4	Low Profile Platform	(24) 1 5/8" (9) Fiber Lines Inside Shaft

3.0 CODES AND LOADING

The monopole was analyzed per ANSI/TIA/EIA-222-F-1996 as referenced by 2005 Connecticut Building Code (based on IBC 2003). The following wind loading was used in compliance with the standard for New Haven County.

- Basic wind speed 85 mph (W) without ice.
- Basic wind speed 74 mph (W_i) with 1/2" radial ice.

The following load combinations were used with wind blowing at 0°, 60° and 90°, measured from a line normal to the face of the tower.

- D + W
- D + W_i + I

D: Dead Load W: Wind Load, without ice
W_i: Wind Load with ice I: Ice Gravity Load

4.0 STANDARD CONDITIONS FOR ENGINEERING SERVICES ON EXISTING STRUCTURES

The analysis is based on the information provided to Atlantis Group and is assumed to be current and correct. Unless otherwise noted, the structure is assumed to be in good condition, free of defects and can achieve theoretical strength.

It is assumed that the structure has been maintained and shall be maintained during its service. The superstructure and the foundation system are assumed to be designed with proper engineering practice and fabricated, constructed and erected in accordance with the design documents. Atlantis Group will accept no liability which may arise due to any existing deficiency in design, material, fabrication, erection, construction, etc. or lack of maintenance.

The analysis does not include a qualification of the mounts attached on the structure or their connections. The analysis is performed to verify the capacity of the main structural members, which is the current practice in the tower industry.

The analysis results presented in this report are only applicable for the previously mentioned existing and proposed appurtenances. Any deviation of the appurtenances and appurtenance placement will require Atlantis Group to generate an additional structural analysis. Additionally, the proposed linear appurtenances should be placed per recommendations of this report.

5.0 ANALYSIS and ASSUMPTIONS

The tower was analyzed by utilizing Risa-Tower, a non-linear 3-Dimensional finite element software, a product of Tower Numerics, Inc. Software output for this analysis is provided in Appendix-A of this report.

6.0 RESULTS AND CONCLUSION

The existing monopole is found to have **adequate** structural capacity for the proposed changes by T-Mobile. For the aforementioned load combinations, the second shaft from the ground level is stressed to **98%** of capacity as a maximum. Anchor bolts and base plate are stressed to maximum **86%** usage of capacity. Monopole foundation (caisson) is also found to have adequate structural capacity using Brom's method.

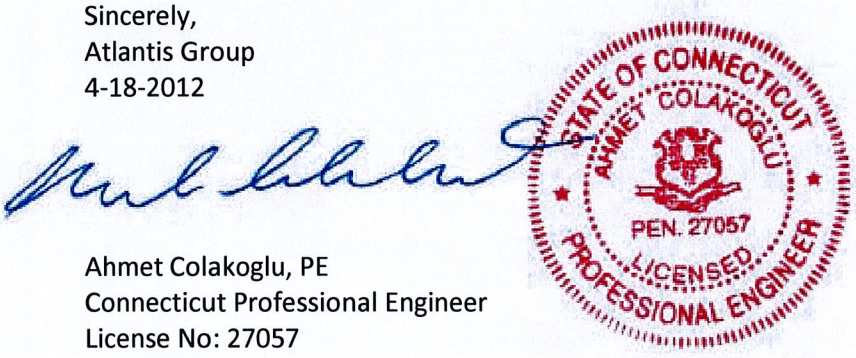
Therefore, the proposed additions and alterations by T-Mobile can be implemented as intended, with the conditions outlined in this report.

Reactions Comparison

Reactions	Analysis Reactions	PJF Analysis Reactions
Base Shear (kips)	38.2	33
Base Moment (kip-ft)	4596	3888

Should you need any clarifications or have any questions about this letter, please contact me at (617) 965-0789.

Sincerely,
Atlantis Group
4-18-2012



Ahmet Colakoglu, PE
Connecticut Professional Engineer
License No: 27057

EXHIBIT C

EBI CONSULTING
www.ebiconsulting.com

21 B Street
Burlington, MA 01803
Tel: (781) 273.2500

RADIO FREQUENCY EMISSIONS ANALYSIS REPORT
EVALUATION OF HUMAN EXPOSURE POTENTIAL TO NON-IONIZING EMISSIONS

T-Mobile Existing Facility

Site ID: CT11720A

Town of Orange Monopole
26 South Orange Center Road
Orange, CT 06477

June 11, 2012

EBI CONSULTING
www.ebiconsulting.com

21 B Street
Burlington, MA 01803
Tel: (781) 273.2500

June 11, 2012

T-Mobile USA
Attn: Jason Overbey, RF Manager
35 Griffin Road South
Bloomfield, CT 06002

Re: Emissions Values for Site CT11720A –Town of Orange Monopole

EBI Consulting was directed to analyze the proposed T-Mobile facility located at 26 South Orange Center Road, Orange, CT, 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 97-01and ANSI/IEEE Std C95.1. The FCC regulates Maximum Permissible Exposure in units of microwatts per square centimeter (μW/cm2). The number of μW/cm2 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 public 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 public 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 (μW/cm2). The general population exposure limit for the cellular band is 567 μW/cm2, and the general population exposure limit for the PCS band is 1000 μW/cm2. 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.

21 B Street
Burlington, MA 01803
Tel: (781) 273.2500

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 26 South Orange Center Road, Orange, CT, 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, the actual antenna pattern gain value in the direction of the sample area was used. For this report the sample point is a 6 foot person standing at the base of the tower

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

1) 2 GSM channels (1935.000 MHz—to 1945.000 MHz / 1980.000 MHz—to 1985.000 MHz) were considered for each sector of the proposed installation.
2) 2 UMTS channels (2110.000 MHz to 2120.000 MHz / 2140.000 MHz to 2145.000 MHz) were considered for each sector of the proposed installation
3) 2 LTE channels (2110.000 MHz to 2120.000 MHz / 2140.000 MHz to 2145.000 MHz) were considered for each sector of the proposed installation
4) 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.
5) For the following calculations the sample point was the top of a six foot person standing at the base of the tower. The actual gain in this direction was used per the manufactures supplied specifications.
6) The antenna used in this modeling is the Ericsson AIR21 for LTE, UMTS and GSM. This is based on feedback from the carrier with regards to anticipated antenna selection. This antenna has a 15.6 dBd gain value at its main lobe. Actual antenna gain values were used for all calculations as per the manufacturers specifications

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7) The antenna mounting height centerline of the proposed antennas is **150 feet** above ground level (AGL)
8) 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.

All calculation were done with respect to uncontrolled / general public threshold limits

Site ID	CT11720A - Town of Orange Monopole
Site Addresss	26 South Orange Center Road, Orange CT 06477
Site Type	Monopole

Sector 1

Antenna Number	Antenna Make	Antenna Model	Status	Frequency Band	Technology	Power Out Per Channel (Watts)	Number of Channels	Composite Power	Antenna Gain in direction of sample point (dBd)	Antenna Height (ft)	analysis height	Cable Size	Cable Loss (dB)	Additional Loss	ERP	Power Density Value	Power Density Percentage
1a	Ericsson	AIR21 B4A/B2P	Active	AWS - 2100 MHz	LTE	60	2	120	-3.95	150	144	None	0	0	48.326044	0.837842	0.08378%
1b	Ericsson	AIR21 B4A/B2P	Not Used	-	-			0	-3.95	150	144	None	0	0	0	0	0.00000%
2a	Ericsson	AIR21 B2A / B4P	Active	PCS - 1950 MHz	GSM / UMTS	30	2	60	-3.95	150	144	None	0	0	24.163022	0.418921	0.04189%
2B	Ericsson	AIR21 B2A / B4P	Passive	AWS - 2100 MHz	UMTS	30	2	60	-3.95	150	144	1-5/8"	0	0	24.163022	0.418921	0.04189%
														Sector total Power Density Value:			0.16757%

Sector 2

Antenna Number	Antenna Make	Antenna Model	Status	Frequency Band	Technology	Power Out Per Channel (Watts)	Number of Channels	Composite Power	Antenna Gain in direction of sample point (dBd)	Antenna Height (ft)	analysis height	Cable Size	Cable Loss (dB)	Additional Loss	ERP	Power Density Value	Power Density Percentage
1a	Ericsson	AIR21 B4A/B2P	Active	AWS - 2100 MHz	LTE	60	2	120	-3.95	150	144	None	0	0	48.326044	0.837842	0.08378%
1b	Ericsson	AIR21 B4A/B2P	Not Used	-	-			0	-3.95	150	144	None	0	0	0	0	0.00000%
2a	Ericsson	AIR21 B2A / B4P	Active	PCS - 1950 MHz	GSM / UMTS	30	2	60	-3.95	150	144	None	0	0	24.163022	0.418921	0.04189%
28	Ericsson	AIR21 B2A / B4P	Passive	AWS - 2100 MHz	UMTS	30	2	60	-3.95	150	144	1-5/8"	0	0	24.163022	0.418921	0.04189%
														Sector total Power Density Value:			0.16757%

Sector 3

Antenna Number	Antenna Make	Antenna Model	Status	Frequency Band	Technology	Power Out Per Channel (Watts)	Number of Channels	Composite Power	Antenna Gain in direction of sample point (dBd)	Antenna Height (ft)	analysis height	Cable Size	Cable Loss (dB)	Additional Loss	ERP	Power Density Value	Power Density Percentage
1a	Ericsson	AIR21 B4A/B2P	Active	AWS - 2100 MHz	LTE	60	2	120	-3.95	150	144	None	0	0	48.326044	0.837842	0.08378%
1b	Ericsson	AIR21 B4A/B2P	Not Used	-	-			0	-3.95	150	144	None	0	0	0	0	0.00000%
2a	Ericsson	AIR21 B2A / B4P	Active	PCS - 1950 MHz	GSM / UMTS	30	2	60	-3.95	150	144	None	0	0	24.163022	0.418921	0.04189%
28	Ericsson	AIR21 B2A / B4P	Passive	AWS - 2100 MHz	UMTS	30	2	60	-3.95	150	144	1-5/8"	0	0	24.163022	0.418921	0.04189%
														Sector total Power Density Value:			0.16757%

Site Composite MPE %	
Carrier	MPE %
T-Mobile	0.50271%
Sprint	2.99000%
Clearwire	1.15%
Pocket	2.50%
AT&T	6.68%
Verizon Wireless	18.89%
Nextel	4.05%
Total Site MPE %	**36.763%**

EBI CONSULTING
www.ebiconsulting.com

21 B Street
Burlington, MA 01803
Tel: (781) 273.2500

Summary

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

The anticipated Maximum Composite contributions from the T-Mobile facility are **0.503% (0.168% from each sector)** of the allowable FCC established general public limit considering all three sectors simultaneously sampled at the ground level.

The anticipated composite MPE value for this site assuming all carriers present is **36.763%** of the allowable FCC established general public 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