



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

January 3, 2023

Denise Sabo  
Northeast Site Solutions  
4 Angela's Way  
Burlington, CT 06013  
[denise@northeastsitesolutions.com](mailto:denise@northeastsitesolutions.com)

RE: **EM-VER-108-221230** – Verizon Wireless notice of intent to modify an existing telecommunications facility located at 20 Great Oak Road, Oxford, Connecticut.

Dear Denise Sabo:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on December 30, 2022.

According to Section 16-50j-71 of the Regulations of Connecticut State Agencies, "...any modification, as defined in Section 16-50j-2a of the Regulations of Connecticut State Agencies, to an existing tower site, except as specified in Sections 16-50j-72 and 16-50j-88 of the Regulations of Connecticut State Agencies, may have a substantial adverse environmental effect."

Staff has reviewed this exempt modification request for completeness and has identified the following deficiencies:

- a) On September 23, 2022, the Council issued a memorandum to telecommunications industry representatives requiring a cumulative far-field Radio Frequency Power Density Analysis to be provided with all telecommunications exempt modification requests. The radio frequency emissions report provided with the request does not include a cumulative far-field analysis. 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/20220923-farfieldmemo_final.pdf).
- c) The construction drawings dated June 28, 2022 cite the 2015 International Building Code (IBC); however, the State of Connecticut has adopted the 2022 Connecticut State Building Code (CSBC) effective October 1, 2022 (which incorporates the 2021 IBC); and
- b) The Structural Analysis dated June 29, 2022 cites the 2018 CSBC; however, the State of Connecticut has adopted the 2022 CSBC effective October 1, 2022; and
- d) The Mount Analysis dated November 10, 2022 cites ANSI/TIA-222-H but does not specifically cite the 2022 CSBC or 2021 IBC;

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Verizon provide an RF Analysis including a rigorous cumulative far-field analysis for all entities 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 updated construction drawings, Structural Analysis, and Mount Analysis that comport with the current 2022 CSBC/2021 IBC on or before January 30, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to January 30, 2023. **Please provide an electronic version of the requested information for the incomplete exempt modification to be rendered complete and**

**processed. Please include the Council's exempt modification 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 dark ink, appearing to read "Melanie Bachman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Melanie Bachman  
Executive Director