



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

Web Site: portal.ct.gov/csc

VIA ELECTRONIC MAIL

January 19, 2023

Kenneth C. Baldwin, Esq.
Robinson & Cole
280 Trumbull Street
Hartford, CT 06103
kbaldwin@rc.com

RE: **EM-VER-126-221222** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 162 Birdseye Road, Shelton, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on December 22, 2022. On January 4, 2023, the Council issued a letter (enclosed) stating that the request for exempt modification was incomplete because the Mount Analysis (MA), cited ANSI/TIA-222-H but did not specifically cite the 2022 Connecticut State Building Code (CSBC) effective October 1; and that the radio frequency (RF) analysis provided with the request did not include a cumulative far-field RF analysis for all entities on the tower. The Council recommended that Verizon provide an updated Mount Analysis that comports with the current 2022 CSBC and 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%, on or before February 6, 2023.

On January 18, 2023, the Council received an electronic mail with a revised MA dated January 5, 2023 and a copy of the original RF analysis. However, the RF analysis provides a far field %MPE for Verizon in addition to the -10dB near field %MPE values from other wireless carriers located on the tower. The RF analysis does not provide a rigorous **cumulative** far-field analysis for all entities located on the tower.

Therefore, the exempt modification request remains incomplete at this time. The Council recommends that Verizon provide a revised **cumulative** RF Analysis that includes a rigorous far-field analysis for Verizon's proposed installation and all other 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%, on or before February 22, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to February 22, 2023.

Please provide an electronic version and one hard copy 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 cursive script, appearing to read "Melanie Bachman".

Melanie Bachman
Executive Director

MAB/ANM/lm

Enclosure: Incomplete letter dated January 4, 2023



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RE: **EM-VER-126-221222** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 162 Birdseye Road, Shelton, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on December 22, 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. the Mount Analysis dated July 8, 2022, cites ANSI/TIA-222-H but does not specifically cite the 2022 Connecticut State Building Code (CSBC) effective October 1, and
- b. 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 includes a far-field analysis for Verizon but does not include a cumulative far-field analysis for all entities on the tower. 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/csc/20220923-farfieldmemo_final.pdf)

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Verizon provide an updated Mount Analysis that comports with the current 2022 CSBC and 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%, on or before February 6, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to February 6, 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.**

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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

MAB/ANM/laf