

AT&T WIRELESS

EM-AT&T-035-057-103-130-020307

*231 Kettle town Road, Southbury,
Sound Shore Drive, Greenwich,
West Avenue, Darien,
Rowyaton Avenue, Norwalk*

*See Complete file under
Darien*

CUDDY & FEDER & WORBY LLP

90 MAPLE AVENUE
WHITE PLAINS, NEW YORK 10601-5196

(914) 761-1300

TELECOPIER (914) 761-5372/6405

www.cfwlaw.com

500 FIFTH AVENUE
NEW YORK, NEW YORK 10110
(212) 944-2841

TELECOPIER (212) 944-2843

WESTAGE BUSINESS CENTER
300 SOUTH LAKE DRIVE
FISHKILL, NEW YORK 12524
(845) 896-2229

TELECOPIER (845) 896-3672

STAMFORD, CONNECTICUT
NORWALK, CONNECTICUT

CUDDY & FEDER
1971-1995

WILLIAM S. NULL
DAWN M. PORTNEY
ELISABETH N. RADOW
NEIL T. RIMSKY
RUTH E. ROTH
JENNIFER L. VAN TUYL
CHAUNCEY L. WALKER (also CA)
ROBERT L. WOLFE
DAVID E. WORBY

Of Counsel
MICHAEL R. EDELMAN
ANDREW A. GLICKSON (also CT)
ROBERT L. OSAR (also TX)
MARYANN M. PALERMO
ROBERT C. SCHNEIDER
LOUIS R. TAFFERA

NEIL J. ALEXANDER (also CT)
CHARLES T. BAZYDLO (also NJ)
THOMAS R. BEIRNE (also DC)
THOMAS M. BLOOMER
JOSEPH P. CARLUCCI
KENNETH J. DUBROFF
ROBERT FEDER
CHRISTOPHER B. FISHER (also CT)
ANTHONY B. GIOFFRE III (also CT)
SUSAN E.H. GORDON
KAREN G. GRANIK
JOSHUA J. GRAUER
WAYNE E. HELLER (also CT)
KENNETH F. JURIST
MICHAEL L. KATZ (also NJ)
JOSHUA E. KIMERLING (also CT)
DANIEL F. LEARY (also CT)
BARRY E. LONG

March 6, 2002

VIA FEDERAL EXPRESS

Hon. Mortimer Gelston, Chairman and Members
of the Siting Council
Connecticut Siting Council
10 Franklin Square
New Britain, Connecticut 06051

Re: AT&T Wireless TS-AT&T-130-000703
231 Kettletown Road,
Southbury, Connecticut
Notice of Exempt Modification



Hon. Mortimer Gelston, Chairman and Members of the Siting Council:

On July 25, 2000 the Council ruled that AT&T's proposed shared use of the existing Omnipoint facility in Southbury complied with Section 16-50aa of the Regulations of Connecticut State Agencies (TS-AT&T-130-000703) permitting AT&T to install panel antennas on the existing tower, with associated equipment cabinets on a concrete pad located within the fenced compound.

This notice of exempt modification is being provided pursuant to Section 16-50j-72 of the Council's regulations. AT&T will be installing an additional equipment cabinet (approximately 76"H x 76"W x 30"D) on AT&T's existing concrete pad at the facility. There will be no other infrastructure changes to AT&T's facility.

The proposed addition of equipment to AT&T Wireless' facility does not constitute a "modification" of an existing facility as defined in Connecticut General Statutes Section 16-50i(d). The proposed addition to AT&T Wireless' facility will not result in an increase in the

CUDDY & FEDER & WORBY LLP

March 6, 2002

Page 2

Tower's height or extend the boundaries of the existing fenced area surrounding the Tower. Further, there will be no increase in noise levels by six (6) decibels or more at the Tower site's boundary. AT&T has made measurements of the existing facility to confirm compliance with MPE limits and as set forth in a report prepared by Wireless Facilities, Inc., annexed hereto, the total radio frequency electromagnetic radiation power density at the Tower site's boundary will not be increased to or above the standard adopted by the Connecticut Department of Environmental Protection as set forth in Section 22a-162 of the Connecticut General Statutes. For all the foregoing reasons, addition of AT&T Wireless' equipment to its existing facility constitutes an exempt modification which will not have a substantially adverse environmental effect.

AT&T Wireless respectfully submits that the proposed addition of equipment to the Kettletown Road Facility meets the Council's exemption criteria and requests an acknowledgment of same.

Respectfully Submitted,



Christopher B. Fisher, Esq.
On behalf of AT&T Wireless

cc: First Selectman, Town of Southbury
Darryl Hendrickson, Bechtel Telecommunications



Wireless Facilities, Inc.
 1840 Michael Faraday Drive
 Suite 200
 Reston, VA 20190

February 22, 2002

Mr. Mortimer A. Gelston, Chairman
 Connecticut Siting Council
 10 Franklin Square
 New Britain, CT 06051

RE: FCC Compliance Statement for AT&T Site CT-185 (Southbury)

Dear Mr. Gelston:

On behalf of AT&T Wireless, Wireless Facilities Inc. has performed office analyses for the above referenced site to determine compliance with FCC mandated Maximum Permissible Exposure (MPE) limits as defined in 47 CFR § 1.1310.

The table below gives a brief summary of the site location, its configuration and associated technical parameters.

Summary of AT&T site configuration and technical parameters:

Site ID	CT-185
Site Name	Southbury
Latitude	41.47027
Longitude	-73.20472
Address of structure	231 Kettletown Rd, Southbury, CT 06488
Type of structure	Monopole
Antenna structure owner	Omnipoint Communications
FCC class and Type of service	PCS TDMA (IS-136) PCS GSM
Operating frequency	D, E bands (PCS)
Azimuths	30, 150, 270
Elevation (ft)	175
Antenna manufacturer	EMS Wireless
Antenna type	Panel

The mathematical equations used in evaluating the power density values are exactly as outlined in the Office of Engineering & Technology (OET) Bulletin Number 65 which contains the FCC guidelines for evaluating human exposure to radio-frequency electromagnetic fields.

In the case of a single radiating antenna, a prediction for power density in the far field of the antenna can be written as:

$$S = \frac{EIRP}{4\pi D^2} = \frac{1.64 * ERP}{4\pi D^2}$$

Where: S = Power density in W/m²
 EIRP = Effective isotropic radiated power (W)
 ERP = Effective radiated power (W)
 D = Distance in meters

Using the EPA's recommended factor of 1.6 for 100 % reflection, the worst case power density can be obtained by incorporating this factor into the above equation. If the distance, D, is in meters, the ERP is in Watts, then the worst case power density in μW/cm² is given by

$$S = \frac{33.4 * ERP}{D^2} \text{ (Section 2, OET bulletin 65).}$$

Where: S = Power density in μW/cm²
 ERP = Effective radiated power (W)
 D = Distance in meters

The calculations for the power density measurement make the following assumptions:

- ◆ WFI's analysis considered all existing antennas of all carriers and the future GSM deployment AT&T is proposing.
- ◆ The formula utilized for the calculation is taken from the FCC recommended OET bulletin 65 (shown above).
- ◆ The worst case scenario was assumed with all the antennas for both the current and the future installation pointing to the base of the tower.
- ◆ A 100 % duty cycle with maximum power and the maximum number of channels per sector for each system was assumed. (see following table)

Description	AT&T PCS		Sprint PCS	SNET Cellular	Voicestream PCS
	Current	Future			
Max. ERP/Ch, Watts	87.2	275	400	100	400
Max. No. of Ch/Sector	16	4	3	21	2
Max. ERP/Sector, Watts	1395.2	1100	1200	2100	800
Antenna Centerline, ft.	175	175	165	185	195

The maximum worst-case values of the power density for this analysis are outlined below:

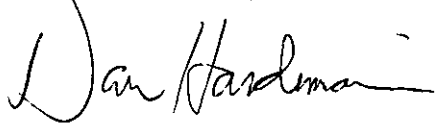
Provider/Carrier		Point of Worst Case Predicted Level	Predicted Value $\mu\text{W}/\text{cm}^2$	Maximum Limit for PCS or Cellular Band Uncontrolled Environment Set by FCC $\mu\text{W}/\text{cm}^2$	% of the Standard
AT&T	PCS TDMA	Base of the tower	17.55	1000	1.755
	PCS GSM	Base of the tower	13.84	1000	1.384
Sprint, PCS		Base of the tower	17.05	1000	1.705
SNET, Cellular		Base of the tower	23.55	550	4.28
Voicestream, PCS		Base of the tower	8.05	1000	0.805
Total % of Standard					9.929

The results of these analyses indicate that output power levels for the AT&T owned equipment deployed at the above referenced facility meets FCC approved exposure limits for all uncontrolled areas where general population exposure may exist. Thus, the maximum level of RF radiation contributed by AT&T in all uncontrolled areas (Assuming a worst case scenario and a 100 % duty cycle for all the transmitters.) is equal or less than 3.139% (1.755 + 1.384) of the maximum permissible exposure limit mandated by the FCC and endorsed by the NCRP and ANSI/IEEE.

The worst-case composite level of RF radiation in all uncontrolled areas for all identified systems operating at this facility is equal or less than 9.929 % of the FCC maximum permissible exposure limit.

To the best of my knowledge, the statements made and information disclosed in this study are complete and accurate.

Sincerely,
Wireless Facilities, Inc.



Dan Hardiman
Senior Engineer II
Fixed Network Engineering