

VIA ELECTRONIC MAIL

November 23, 2022

Katie Adams SR Site Acquisition Specialist Network Building & Consulting 100 Apollo Drive, Suite 303 Chelmsford, MA 01824 kadams@nbcllc.com

RE: **EM-VER-135-221118** – Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 69 Guinea Road, Stamford, Connecticut.

Dear Katie Adams:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on November 18, 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); and
- b) The Structural Analysis (SA) and Construction Drawings (CDs) dated July 21, 2022, and September 8, 2022, respectively, cite the 2018 Connecticut State Building Code (CSBC); however, the State of Connecticut has adopted the 2022 CSBC effective October 1, 2022.

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 SA and CDs that comport with the current 2022 CSBC on or before December 23, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to December 23, 2022. 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 incompletion 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,

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Melanie Bachman Executive Director