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

October 21, 2020

Carolyn Seeley
Site Acquisition Supervisor
Qualtek Wireless
16 Esquire Road
Billerica, MA 01862

RE: **EM-AT&T-142-200929** – AT&T notice of intent to modify an existing telecommunications facility located at 130 Bald Hill Road, Tolland, Connecticut.

Dear Ms. Seeley:

The Connecticut Siting Council (Council) is in receipt of your correspondence of October 20, 2020 submitted in response to the Council's October 14, 2020 notification of an incomplete request for exempt modification with regard to the above-referenced matter.

The submission renders the request for exempt modification complete and the Council will process the request in accordance with the Federal Communications Commission 60-day timeframe.

Thank you for your attention and cooperation.

Sincerely,

s/ Melanie A. Bachman

Melanie A. Bachman
Executive Director

MAB/IN/emr

From: Carolyn Seeley <cseeley@qualtekwireless.com>
Sent: Monday, October 19, 2020 8:50 PM
To: Fontaine, Lisa <Lisa.Fontaine@ct.gov>
Cc: CSC-DL Siting Council <Siting.Council@ct.gov>
Subject: [WARNING: MESSAGE ENCRYPTED]CT5331 | Council Incomplete Letter for EM-AT&T-142-200929

Hi Lisa,
Attached are the following docs.

- Passing Mount Analysis
- Proof of delivery to the cc'd parties
- EME report
- Original facility approval

Please let me know if you need any additional info.

Thank you,

Carolyn Seeley
Site Acquisition Supervisor

16 Esquire Road | Billerica, MA 01862
Mobile: 339-234-8397
Email: cseeley@qualtekwireless.com
Website: QualTekServices.com

ORIGINAL

DOCKET NO. 159 - An application of the Department of Public Safety, Division of State Police for a Certificate of Environmental Compatibility and Public Need for the construction, operation, and maintenance of telecommunications facilities located off of Bald Hill Road at an existing Northeast Utilities tower site approximately 2,000 feet north from Route 190 in Union, and at the new Troop C Barracks on Route 74 approximately 2,500 feet west from Exit 69 off of Interstate 84 in Tolland, Connecticut.	:	Connecticut Siting Council June 29, 1993

DECISION AND ORDER

Pursuant to the foregoing Findings of Fact and Opinion, the Connecticut Siting Council (Council) finds that the effects associated with the construction, operation, and maintenance of telecommunications facilities at the proposed sites in Union and Tolland, Connecticut, including effects on the natural environment; ecological integrity and balance; public health and safety; scenic, historic, and recreational values; forests and parks; air and water purity; and fish and wildlife are not disproportionate either alone or cumulatively with other effects when compared to need, are not in conflict with the policies of the State concerning such effects, and are not sufficient reason to deny the application, and therefore directs that a Certificate of Environmental Compatibility and Public Need, as provided by section 16-50k of the General Statutes of Connecticut (CGS), be issued to the Connecticut Department of Public Safety, Division of State Police, for the construction, operation, and maintenance of telecommunications facilities at the proposed sites off of Bald Hill Road in Union and at the new Troop C Barracks in Tolland, Connecticut.

The facilities shall be constructed, operated, and maintained substantially as specified in the Council's record in this proceeding, and subject to the following conditions:

1. The proposed Union self-supporting lattice tower shall be designed no taller than necessary to provide the proposed communications and in no event shall it exceed the proposed height of 180-feet above ground level (AGL) excluding antennas.

2. The proposed Tolland self-supporting lattice tower shall be designed no taller than necessary to provide the proposed communications and in no event shall it exceed the proposed height of 120-feet AGL excluding antennas.

3. The CSP shall apply to the Federal Aviation Administration (FAA) for an amendment to waive the lighting and marking of the Union tower if the FAA so rules that the tower is to be lighted and marked. Copies of the CSP's application for amendment shall be filed with the Council within two (2) weeks of their filing with the FAA. If the FAA rules that the tower must be lighted and marked, the CSP shall submit all lighting and marking options for Council review and approval.

4. The Certificate holder shall prepare Development and Management (D&M) plans for both sites in accordance with sections 16-50j-75 through 16-50j-77 of the Regulations of State Agencies (RSA). The D&M plans shall be submitted to and approved by the Council prior to the commencement of facility construction and shall also include detailed plans for the placement of the towers and equipment buildings, tower heights, access roads, utility line installation, erosion and sediment controls, fencing, and site landscaping.

5. The Certificate holder shall comply with all existing and future radio frequency (RF) standards promulgated by State or federal regulatory agencies. Upon the establishment of any new governmental RF standards, the Certificate holder shall provide such notice to the Council and the facilities granted herein shall be brought into compliance with such standards as soon as practicable.

6. The Certificate holder shall provide the Council a recalculated report of radio frequency power density if and when circumstances in operation cause an increase in the power density above the levels used herein by the Council to render its decision.

7. The Certificate holder shall permit public or private entities to share space on the proposed towers for fair consideration, or shall provide any requesting party with specific legal, technical, environmental, or economic reasons precluding such tower sharing.

8. If either facility does not initially provide, or permanently ceases to provide telecommunications service following completion of construction, this Decision and Order shall be void, and the tower and all associated equipment shall be dismantled and removed or re-application for any new use shall be made to the Council before any such new use is made.

Unless otherwise approved by the Council, this Decision and Order shall be void if all construction authorized herein is not completed within five (5) years of the

effective date of this Decision and Order or within five years after all appeals to this Decision and Order have been resolved.

Pursuant to CGS section 16-50p, we hereby direct that a copy of the Findings of Fact, Opinion, and Decision and Order be served on each person listed below, and notice of issuance shall be published in the Hartford Courant and the Journal Inquirer.

By this Decision and Order, the Council disposes of the legal rights, duties, and privileges of each party named or admitted to the proceeding in accordance with RSA section 16-50j-17.

The party to this proceeding is:

APPLICANT	ITS REPRESENTATIVES
Connecticut State Police	Mr. George L. Davis Emergency Telecommunications Engineer Telecommunications Section Department of Public Safety Division of State Police 294 Colony Street, Bldg. 5 Meriden, CT 06450 L. D. McCallum and Stephen R. Sarnoski Office of the Attorney General MacKenzie Hall 110 Sherman Street Hartford, CT 06105

CERTIFICATION

The undersigned members of the Connecticut Siting Council (Council) hereby certify that they have heard this case, or read the record thereof, in DOCKET NO. 159 - An application of the Department of Public Safety, Division of State Police for a Certificate of Environmental Compatibility and Public Need for the construction, operation, and maintenance of telecommunications facilities located off of Bald Hill Road at an existing Northeast Utilities tower site approximately 2,000 feet north from Route 190 in Union, and at the new Troop C Barracks on Route 74 approximately 2,500 feet west from Exit 69 off of Interstate 84 in Tolland, Connecticut, and voted as follows to approve the proposed sites:

Council Members	Vote Cast
Mortimer A. Gelston Chairman	YES
Commissioner Clifton A. Leonhardt Designee: Gerald J. Heffernan	YES
Commissioner Timothy R.E. Keeney Designee: Brian Emerick	ABSENT
Harry E. Covey	YES
Daniel P. Lynch, Jr.	YES
Gloria Dibble Pond	ABSENT
Paulann H. Sheets	YES
Colin C. Tait	YES
Dana J. Wright	ABSENT

Dated at New Britain, Connecticut, June 29, 1993.

7010E-2

Account # 161958927

Label Details

Label Number:
9405503699300026476642

SCAN® Form: 947570369930037125256 7

Terms
Acceptance Cutoff: 09/14/2020 4:30 PM
Acceptance Time: 09/16/2020 4:20 PM
Expected Date: 09/17/2020 11:59 PM
Delivery Status: Delivered, PO Box 2020-09-18 08:23:00.0

Label Actions

USPS Tracking®
Ship Again

Need help

File an insurance claim
Request A Service Refund

Return Address:
CAROLYN SEELEY
EMPIRE TELECOM
16 ESQUIRE RD
N BILLERICA, MA 01862-2527
ne_sa_deliverable@empiretelecomm.com

Package:
Ship Date: 09/14/20
Value: $50.00
Weight: 1 lbs 0 oz
From: 01862
Label Type: Batch

Delivery Address:
TYLER MILLIX
TOLLAND COUNTY MUTUAL AID FIRE SERVICE
56 TOLLAND GRN
P O BOX 6
TOLLAND, CT 06084-3044

Service:
Priority Mail® 2-Day
USPS Tracking®

Transaction Number: 505625376
Transaction Type: Label
Payment Method: VISA-4325
Payment Status: Account Charged

Postage Cost	$7.50
USPS Tracking®	Free
Label Total:	**$7.50**
Order Total:	**$30.00**

Timestamp	Message
09-14-2020 13:35:25	LABEL PRINTED
09-14-2020 13:35:03	Getting Payment
09-14-2020 13:34:45	Setting Payment

Tracking for this label is available until January 12, 2021. Need to keep Tracking history longer? Find out if your label is eligible for Premium Tracking today!

Back to Shipping History

Account # 161958927

Label Details

Label Number:
9405503699300026476604

SCAN® Form: 947570369930037125256 7

Terms
Acceptance Cutoff: 09/14/2020 4:30 PM

Acceptance Time: 09/16/2020 4:20 PM

Expected Date: 09/17/2020 11:59 PM

Delivery Status: Delivered, Front Door/Porch
2020-09-18 10:33:00.0

Label Actions

USPS Tracking®
Ship Again

Need help

File an insurance claim
Request A Service Refund

Return Address:
CAROLYN SEELEY
EMPIRE TELECOM
16 ESQUIRE RD
N BILLERICA, MA 01862-2527
ne_sa_deliverable@empiretelecomm.com

Delivery Address:
MICHAEL ROSEN
TOWN OF TOLLAND TOWN MANAGER
21 TOLLAND GRN
TOLLAND, CT 06084-3028

Package:
Ship Date: 09/14/20
Value: $50.00
Weight: 1 lbs 0 oz
From: 01862
Label Type: Batch

Service:
Priority Mail® 2-Day
USPS Tracking®

Feedback

Transaction Number: 505625376
Transaction Type: Label
Payment Method: VISA-4325
Payment Status: Account Charged

Postage Cost	$7.50
USPS Tracking®	Free
Label Total:	**$7.50**
Order Total:	**$30.00**

Timestamp	Message
09-14-2020 13:35:22	LABEL PRINTED
09-14-2020 13:35:03	Getting Payment
09-14-2020 13:34:45	Setting Payment

Tracking for this label is available until January 12, 2021. Need to keep Tracking history longer? Find out if your label is eligible for Premium Tracking today!

Back to Shipping History

Account # 161958927

Label Details

Label Number:
9405503699300026476611

SCAN® Form: 947570369930037125256 7

Terms
Acceptance Cutoff: 09/14/2020 4:30 PM

Acceptance Time: 09/16/2020 4:20 PM

Expected Date: 09/17/2020 11:59 PM

Delivery Status: Delivered, Front Door/Porch 2020-09-18 10:33:00.0

Label Actions

USPS Tracking®
Ship Again

Need help

File an insurance claim
Request A Service Refund

Return Address:
CAROLYN SEELEY
EMPIRE TELECOM
16 ESQUIRE RD
N BILLERICA, MA 01862-2527
ne_sa_deliverable@empiretelecomm.com

Delivery Address:
CYNTHIA MURDOCK
TOWN OF TOLLAND ZONING EXECUTIVE
21 TOLLAND GRN
TOLLAND, CT 06084-3028

Package:
Ship Date: 09/14/20
Value: $50.00
Weight: 1 lbs 0 oz
From: 01862
Label Type: Batch

Service:
Priority Mail® 2-Day
USPS Tracking®

Feedback

Transaction Number: 505625376
Transaction Type: Label
Payment Method: VISA-4325
Payment Status: Account Charged

Postage Cost	$7.50
USPS Tracking®	Free
Label Total:	**$7.50**
Order Total:	**$30.00**

Timestamp	Message
09-14-2020 13:35:23	LABEL PRINTED
09-14-2020 13:35:03	Getting Payment
09-14-2020 13:34:45	Setting Payment

Tracking for this label is available until January 12, 2021. Need to keep Tracking history longer? Find out if your label is eligible for Premium Tracking today!

Back to Shipping History

SiteSafe
A QUALTEK Company

8618 Westwood Center Drive, Suite 315, Vienna, VA 22182
703.276.1100 ● 703.276.1169 fax
info@sitesafe.com ● www.sitesafe.com

Empire Telecom on behalf of AT&T Mobility, LLC
Site FA – 10071279
Site ID – CTL05331
USID – 25953
Site Name – TOLLAND CENTRAL (MRCTB047280)

130 Bald Hill Road
Tolland, CT 06084

Latitude: N41-52-59.13
Longitude: W72-22-32.52
Structure Type: Self-Support

Report generated date: October 19, 2020
Report by: Zyotty Thamsil
Customer Contact: Carolyn Seeley

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

Table of Contents

1 General Site Summary

1.1 Report Summary

AT&T Mobility, LLC	Summary
Max Cumulative Simulated RFE Level on the Ground	<1% General Public Limit
Compliant per FCC Rules and Regulations?	Will Be Compliant
Compliant per AT&T Mobility, LLC's Policy?	No

The following documents were provided by the client and were utilized to create this report:

RFDS: NEW-ENGLAND_CONNECTICUT_CTL05331_2021-LTE-Next-Carrier_LTE_SP656B_2051A0VDNK_10071279_25953_03-09-2020_As-Built-In-Progress_v4.00 (1)

CD's: 10071279.CT5331.LTE4C5GNR.CD.Rev4.10.02.2020

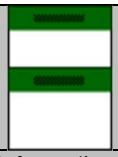
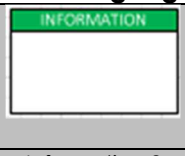
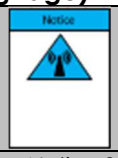
RF Powers Used: Max RRH Power

1.2 Fall Arrest Anchor Point Summary

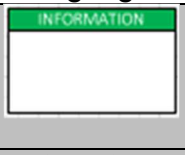
Fall Arrest Anchor & Parapet Info	Parapet Available (Y/N)	Parapet Height (inches)	Fall Arrest Anchor Available (Y/N)
Roof Safety Info	N	N/A	N

1.3 Signage Summary

a. Pre-Site Visit AT&T Signage (Existing Signage)

AT&T Signage Locations									
	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2	Warning	Warning 2	Barriers
Access Point(s)									
Alpha									
Beta									
Gamma									

b. Proposed AT&T Signage

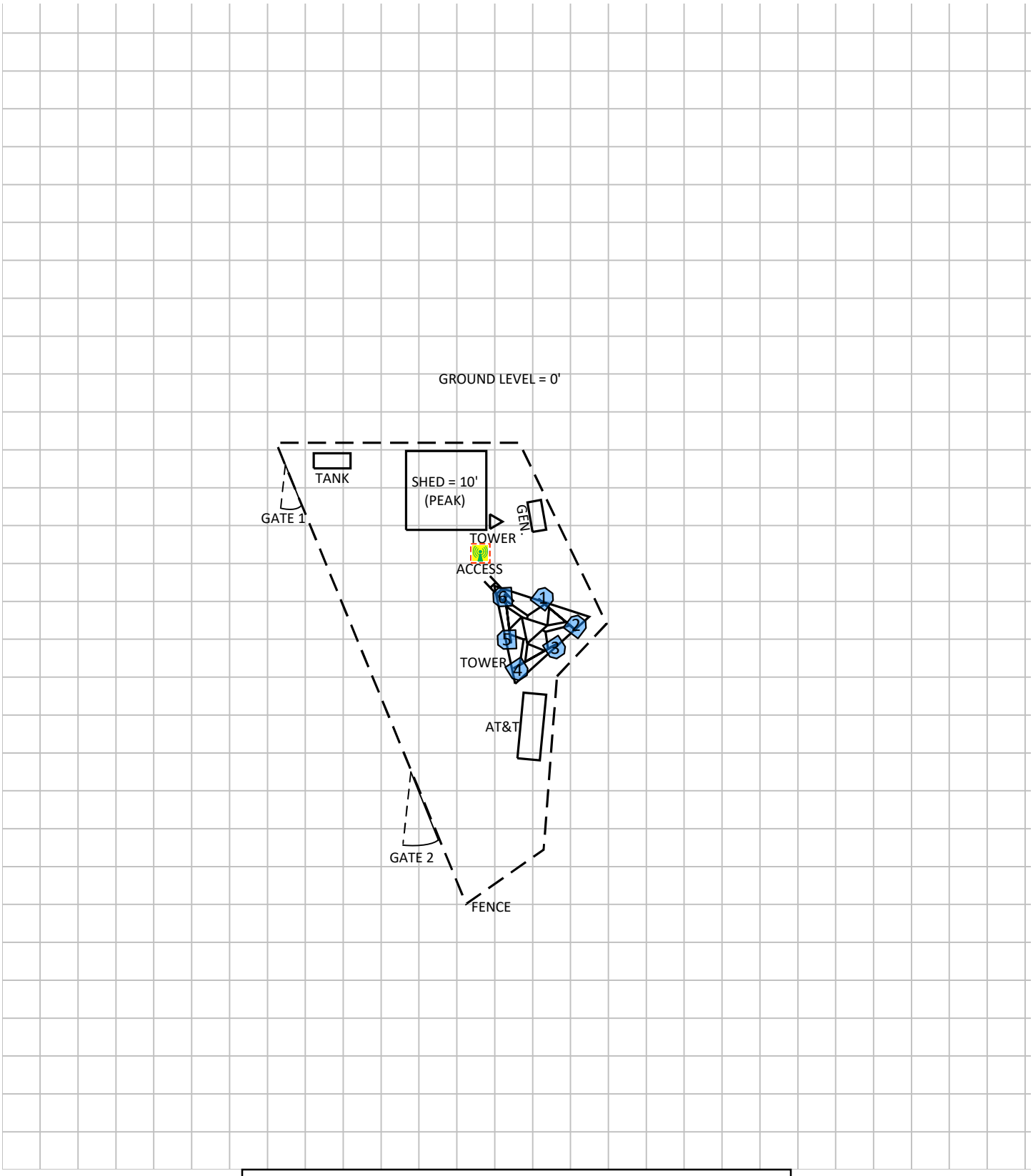
AT&T Signage Locations									
	Information 1	Information 2	Notice	Notice 2	Caution	Caution 2B	Warning	Warning 2	Barriers
Access Point(s)						**1**			
Alpha									
Beta									
Gamma									

2 Scale Maps of Site

The following diagrams are included:

- Site Scale Map
- RF Exposure Diagram
- RF Exposure Diagram – Elevation View

Site Scale Map For: TOLLAND CENTRAL



Carrier Identification

AT&T MOBILITY LLC | VERIZON WIRELESS | T-MOBILE | SPRINT | UNKNOWN CARRIER

Sign Legend

Notice | Notice 2 | Caution | Caution 2B | Warning | Warning 2 | Info | Info 2 | RF Emissions Diagram | Locked Ladder

Existing Barrier

Proposed Barrier/Sign

Remove Sign X

(Feet)

0 18.1 36.2

www.sitesafe.com
10/19/2020 12:10:35 PM

3 Antenna Inventory

The following antenna inventory was obtained by the customer and was utilized to create the site model diagrams:

Ant ID	Operator	Antenna Make & Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Power	Power Type	Power Unit	Misc Loss	TX Count	Total ERP (Watts)	Ant Gain (dBd)	Z (AGL)	MDT	EDT
1	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	763	LTE	30	73.0	8	160	TPO	Watt	0	1	3549.1	13.46	166'	0°	2°
1	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	2300	LTE	30	60.0	8	100	TPO	Watt	0	1	4036.5	16.06	166'	0°	3°
1	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	2100	LTE	30	66.0	8	160	TPO	Watt	0	1	6608.8	16.16	166'	0°	4°
2	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	737	LTE	30	70.6	8	160	TPO	Watt	0	1	2692.3	12.26	166'	0°	2°
2	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	850	LTE	30	71.4	8	80	TPO	Watt	0	1	1442.4	12.56	166'	0°	2°
2	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	1900	LTE	30	67.0	8	160	TPO	Watt	0	1	4169.8	14.16	166'	0°	4°
2	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	850	5G	30	71.4	8	80	TPO	Watt	0	1	1442.4	12.56	166'	0°	2°
3	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	763	LTE	140	73.0	8	160	TPO	Watt	0	1	3549.1	13.46	166'	0°	6°
3	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	2300	LTE	140	60.0	8	100	TPO	Watt	0	1	4036.5	16.06	166'	0°	3°
3	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	2100	LTE	140	66.0	8	160	TPO	Watt	0	1	6608.8	16.16	166'	0°	6°
4	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	737	LTE	140	70.6	8	160	TPO	Watt	0	1	2692.3	12.26	166'	0°	6°
4	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	850	LTE	140	71.4	8	80	TPO	Watt	0	1	1442.4	12.56	166'	0°	6°
4	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	1900	LTE	140	67.0	8	160	TPO	Watt	0	1	4169.8	14.16	166'	0°	6°
4	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	850	5G	140	71.4	8	80	TPO	Watt	0	1	1442.4	12.56	166'	0°	6°
5	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	763	LTE	260	73.0	8	160	TPO	Watt	0	1	3549.1	13.46	166'	0°	2°
5	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	2300	LTE	260	60.0	8	100	TPO	Watt	0	1	4036.5	16.06	166'	0°	3°
5	AT&T MOBILITY LLC (PROPOSED)	CCI Antennas TPA65R-BU8D	Panel	2100	LTE	260	66.0	8	160	TPO	Watt	0	1	6608.8	16.16	166'	0°	6°

Ant ID	Operator	Antenna Make & Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Power	Power Type	Power Unit	Misc Loss	TX Count	Total ERP (Watts)	Ant Gain (dBd)	Z (AGL)	MDT	EDT
6	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	737	LTE	260	70.6	8	160	TPO	Watt	0	1	2692.3	12.26	166'	0°	2°
6	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	850	LTE	260	71.4	8	80	TPO	Watt	0	1	1442.4	12.56	166'	0°	2°
6	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	1900	LTE	260	67.0	8	160	TPO	Watt	0	1	4169.8	14.16	166'	0°	6°
6	AT&T MOBILITY LLC (PROPOSED)	Cci DMP65R-BU8D	Panel	850	5G	260	71.4	8	80	TPO	Watt	0	1	1442.4	12.56	166'	0°	2°

Note: The Z reference indicates the bottom of the antenna height above ground level (AGL). Effective Radiated Power (ERP) is provided by the operator or based on Sitesafe experience. The values used in the modeling may be greater than are currently deployed. Proposed equipment is tagged as (Proposed) under Operator or Antenna Make & Model.

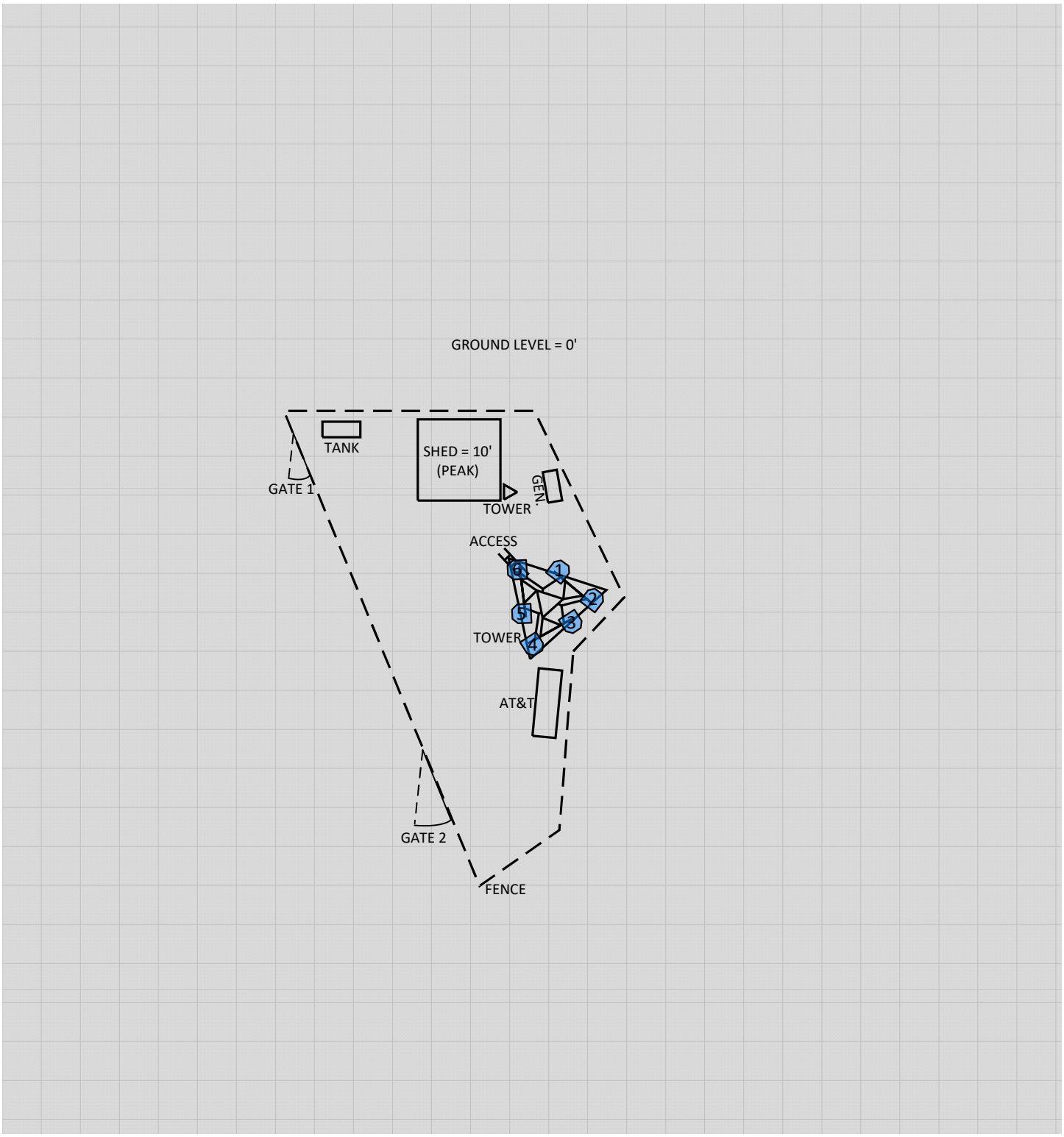
4 Emission Predictions

In the RF Exposure Simulations below, all heights are reflected with respect to ground level. Each different height area, rooftop, or platform level is labeled with its height relative to the main site level. Emissions are calculated appropriately based on the relative height and location of that area to all antennas. The total analyzed elevations in the below RF Exposure Simulations are listed below.

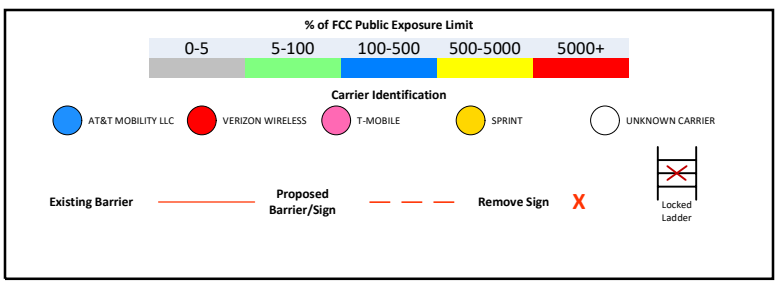
- GROUND LEVEL = 0'
- SHED = 10'

The Antenna Inventory heights are referenced to the same level.

RF Exposure Simulation For: TOLLAND CENTRAL



% of FCC Public Exposure Limit
Spatially Averaged



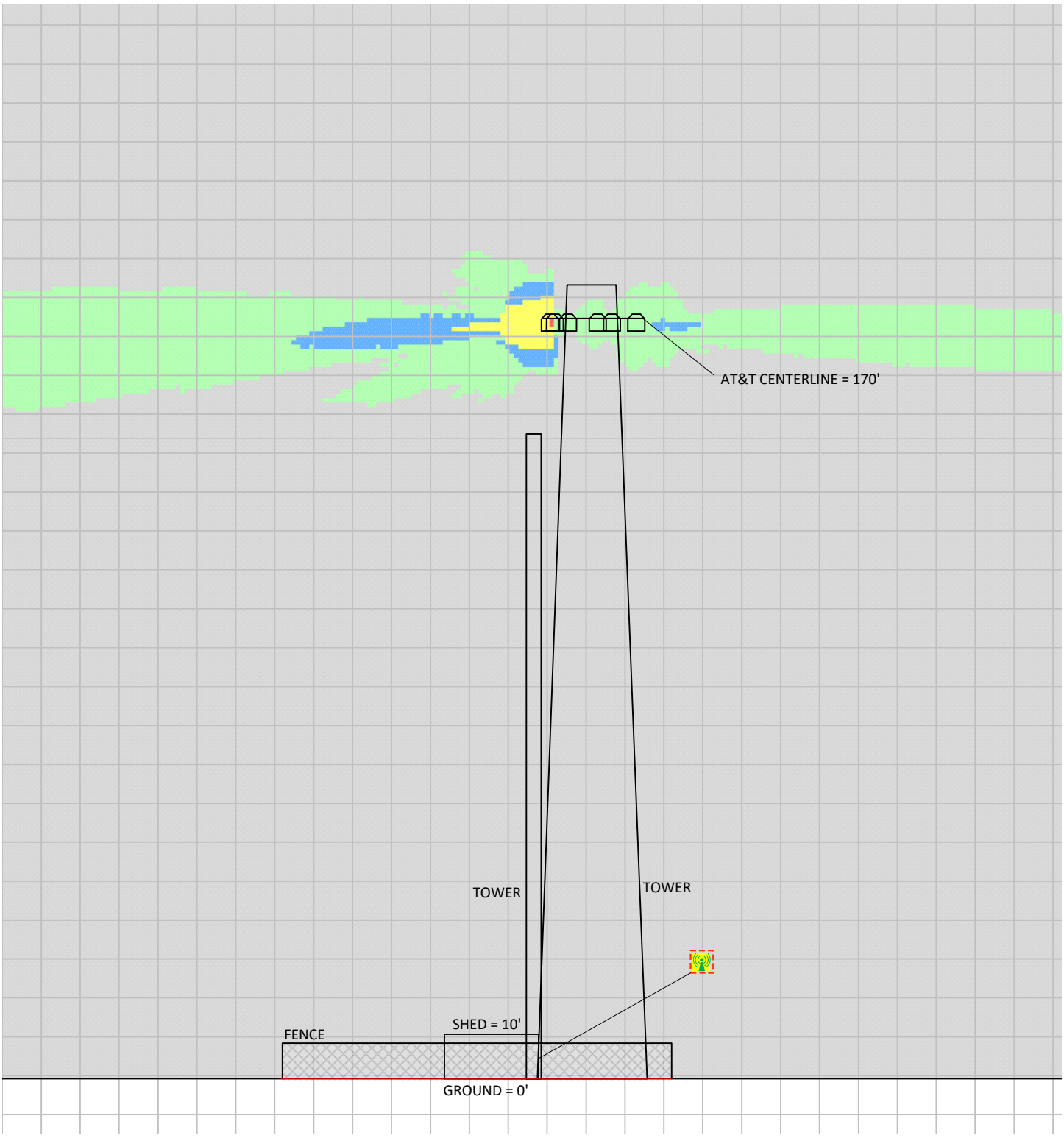
(Feet)

0 19.2 38.4

www.sitesafe.com
10/19/2020 12:08:41 PM

Sitesafe OET-65 Model
Near Field Boundary:
1.5 * Aperture
Reflection Factor: 1
Spatially Averaged

RF Exposure Simulation For: TOLLAND CENTRAL
Elevation View



% of FCC Public Exposure Limit

% of FCC Public Exposure Limit
0-5 | 5-100 | 100-500 | 500-5000 | 5000+

Carrier Identification
AT&T MOBILITY LLC | VERIZON WIRELESS | T-MOBILE | SPRINT | UNKNOWN CARRIER

Sign Legend
Notice | Notice 2 | Caution | Caution 2B | Warning | Warning 2 | Info | Info 2 | RF Emissions Diagram | Locked Ladder

Existing Barrier
Proposed Barrier/Sign
Remove Sign X

(Feet)
0 16.9 33.8

www.sitesafe.com
10/19/2020 12:15:43 PM

Sitesafe OET-65 Model
Near Field Boundary:
1.5 * Aperture
Reflection Factor: 1
Single Level (0)

5 Site Compliance

5.1 Site Compliance Statement

Upon evaluation of the cumulative RF emission levels from all operators at this site, RF hazard signage and antenna locations, Sitesafe has determined that:

AT&T Mobility, LLC will be compliant when the remediation recommended in Section 5.2 or other appropriate remediation is implemented.

The compliance determination is based on General Public RFE levels derived from theoretical modeling, RF signage placement, proposed antenna inventory and the level of restricted access to the antennas at the site. Any deviation from the proposed AT&T Mobility, LLC deployment plan could result in the site being rendered non-compliant.

Modeling is used for determining compliance and the percentage of MPE contribution.

5.2 Actions for Site Compliance

Based on FCC regulations, common industry practice, and our understanding of AT&T Mobility, LLC's RF Safety Policy requirements, this section provides a statement of recommendations for site compliance. Recommendations have been proposed based on our understanding of existing access restrictions, signage, and an analysis of predicted RFE levels.

AT&T Mobility, LLC will be made compliant if the following changes are implemented:

Tower Access Location

(1) Caution 2B sign(s) required on the base of the access ladder.

Notes:

- Any existing signage that conflicts with the proposed signage in this report should be removed per AT&T Signage Posting Rules.
- Data concerning all other carriers on site was unavailable and therefore not included in this report.
- Signage may already be in place. Sitesafe does not have record of any existing signage because there were no previous visits or data supplied regarding them. All remediation is based on a worst-case scenario.

6 Reviewer Certification

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of Site Safe, LLC, in Vienna, Virginia, at which place the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by Zyotty Thamsil.

October 19, 2020

Appendix A – Statement of Limiting Conditions

Sitesafe has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe's recommendations.

Sitesafe may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, that Sitesafe became aware of during the normal research involved in creating this report. Sitesafe will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe obtained information used in this Site Compliance Report from sources that Sitesafe considers reliable and believes them to be true and correct. Sitesafe does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data collected by Sitesafe provided by a second party and data collected by Sitesafe, the data will be used.

Appendix B – Regulatory Background Information

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for evaluating the effects of RF emissions in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 ("OET Bulletin 65"), *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*, Edition 97-01, published August 1997. Since 1996, the FCC periodically reviews these rules and regulations as per their congressional mandate.

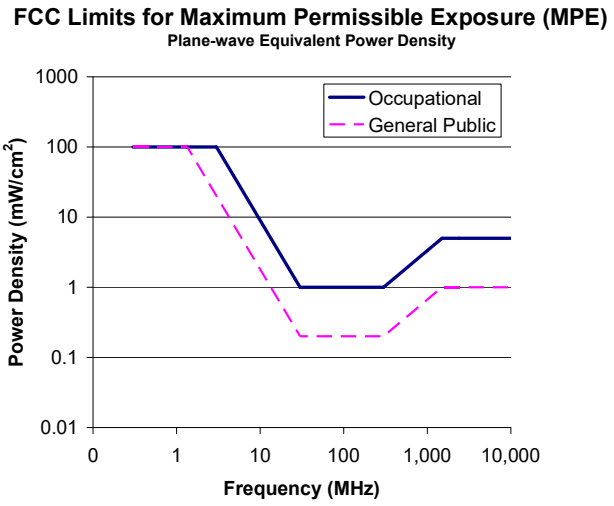
FCC regulations define two separate tiers of exposure limits: Occupational or "Controlled environment" and General Public or "Uncontrolled environment". The General Public limits are generally five times more conservative or restrictive than the Occupational limit. These limits apply to *accessible* areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF warning signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF warning signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:



Limits for Occupational/Controlled Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm^2)	Averaging Time $\|E\|^2$, $\|H\|^2$ or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	($900/f^2$)*	6
30-300	61.4	0.163	1.0	6
300-1500	--	--	f/300	6
1500-100,000	--	--	5	6

Limits for General Population/Uncontrolled Exposure (MPE)

Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm^2)	Averaging Time $\|E\|^2$, $\|H\|^2$ or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	($180/f^2$)*	30
30-300	27.5	0.073	0.2	30
300-1500	--	--	f/1500	30
1500-100,000	--	--	1.0	30

f = frequency in MHz *Plane-wave equivalent power density

OSHA Statement

The General Duty clause of the OSHA Act (Section 5) outlines the occupational safety and health responsibilities of the employer and employee. The General Duty clause in Section 5 states:

(a) Each employer –

(1) shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or are likely to cause death or serious physical harm to his employees;
(2) shall comply with occupational safety and health standards promulgated under this Act.

(b) Each employee shall comply with occupational safety and health standards and all rules, regulations, and orders issued pursuant to this Act which are applicable to his own actions and conduct.

OSHA has defined Radiofrequency and Microwave Radiation safety standards for workers who may enter hazardous RF areas. Regulation Standards 29 CFR § 1910.147 identify a generic Lockout/Tagout procedure aimed to control the unexpected energization or startup of machines when maintenance or service is being performed.

Appendix C – Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

General Maintenance Work: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

Training and Qualification Verification: All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a worker's understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet-based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

RF Signage: Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

Maintain a 3-foot clearance from all antennas: There is a direct correlation between the strength of an EME field and the distance from the transmitting antenna. The further away from an antenna, the lower the corresponding EME field is.

Site RF Emissions Diagram(s): Section 4 of this report contains RF Diagram(s) that outline various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access is restricted and only properly trained individuals can gain access to the antenna locations.

Appendix D – RF Emissions

The RF Emissions Simulation(s) in this report display theoretical spatially averaged percentage of the Maximum Permissible Exposure for all systems at the site unless otherwise noted. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix E.

The key at the bottom of each RF Emissions Simulation indicates percentages displayed referenced to FCC General Public Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:

- Areas indicated as Gray are predicted to be below 5% of the MPE limits. Gray represents areas more than 20 times below the most conservative exposure limit. **Gray areas are accessible to anyone**.
- Green represents areas are predicted to be between 5% and 100% of the MPE limits. **Green areas are accessible to anyone.**
- Blue represents areas predicted to exceed the General Public MPE limits but are less than Occupational limits. **Blue areas should be accessible only to RF trained workers**.
- Yellow represents areas predicted to exceed Occupational MPE limits. **Yellow areas should be accessible only to RF trained workers able to assess current exposure levels.**
- Red represents areas predicted to have exposure more than 10 times the Occupational MPE limits. **Red indicates that the RF levels must be reduced prior to access.** An RF Safety Plan is required which outlines how to reduce the RF energy in these areas prior to access.

If trained occupational personnel require access to areas that are delineated as above 100% of the limit, Sitesafe recommends that they utilize the proper personal protection equipment (RF monitors), coordinate with the carriers to reduce or shutdown power, or make real-time power density measurements with the appropriate power density meter to determine real-time MPE levels. This will allow the personnel to ensure that their work area is within exposure limits.

Appendix E – Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe has further assumed a 100% duty cycle and maximum radiated power.

The modeling is based on recommendations from the FCC's OET-65 bulletin with the following variances per AT&T guidance. Reflection has not been considered in the modeling, i.e. the reflection factor is 1.0. The near / far field boundary has been set to 1.5 times the aperture height of the antenna and modeling beyond that point is the lesser of the near field cylindrical model and the far field model taking into account the gain of the antenna.

The site has been modeled with these assumptions to show the maximum RF energy density. Areas modeled with exposure greater than 100% of the General Public MPE level may not actually occur but are shown as a prediction that could be realized. Sitesafe believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Appendix F – Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio of the maximum power in a given direction to the maximum power in the same direction from an isotropic radiator. Gain is a measure of the relative efficiency of a directional antenna as compared to an omnidirectional antenna.

General Population/Uncontrolled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **unaware** of the potential for exposure and who have no control over their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of "Generic" as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe will use its industry specific knowledge of antenna models to select a worst-case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.

Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The rms and peak electric and magnetic field strength, their squares, or the plane-wave equivalent power densities associated with these fields to which a person may be exposed without harmful effect and with acceptable safety factor.

Occupational/Controlled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **aware** of the potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) – The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.

Appendix G – References

The following references can be followed for further information about RF Health and Safety.

Site Safe, LLC
http://www.sitesafe.com
FCC Radio Frequency Safety
http://www.fcc.gov/encyclopedia/radio-frequency-safety
National Council on Radiation Protection and Measurements (NCRP)
http://www.ncrponline.org
Institute of Electrical and Electronics Engineers, Inc., (IEEE)
http://www.ieee.org
American National Standards Institute (ANSI)
http://www.ansi.org
Environmental Protection Agency (EPA)
http://www.epa.gov/radtown/wireless-tech.html
National Institutes of Health (NIH)
http://www.niehs.nih.gov/health/topics/agents/emf/
Occupational Safety and Health Agency (OSHA)
http://www.osha.gov/SLTC/radiofrequencyradiation/
International Commission on Non-Ionizing Radiation Protection (ICNIRP)
http://www.icnirp.org
World Health Organization (WHO)
http://www.who.int/peh-emf/en/
National Cancer Institute
http://www.cancer.gov/cancertopics/factsheet/Risk/cellphones
American Cancer Society (ACS)
http://www.cancer.org/docroot/PED/content/PED_1_3X_Cellular_Phone_Towers.asp?siteareа=PED
European Commission Scientific Committee on Emerging and Newly Identified Health Risks
http://ec.europa.eu/health/ph_risk/committees/04_scenihr/docs/scenihr_o_022.pdf
Fairfax County, Virginia Public School Survey
http://www.fcps.edu/fts/safety-security/RFEESurvey/
UK Health Protection Agency Advisory Group on Non-Ionizing Radiation
http://www.hpa.org.uk/webw/HPAweb&HPAwebStandard/HPAweb_C/1317133826368
Norwegian Institute of Public Health
http://www.fhi.no/dokumenter/545eea7147.pdf