



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

June 1, 2021

Kenneth C. Baldwin, Esq.  
Robinson & Cole  
280 Trumbull Street  
Hartford, CT 06103-3597  
[kbaldwin@rc.com](mailto:kbaldwin@rc.com)

RE: **EM-VER-148-210511** - Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 20 Alexander Drive, Wallingford, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on May 11, 2021.

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 a deficiency in the Radio Frequency Emissions Analysis Report prepared by Centerline Communications, dated May 11, 2021. The Radio Frequency Analysis Report indicates a calculated, Maximum Permissible Exposure (%MPE) of 21.45 % at ground level. Council staff calculated the power density for the proposed modification using the data provided in Appendix D of the report and assuming one channel for each entry as no number of channels were provided, and using the Federal Communications Commission (FCC) OET Bulletin 65 predictive methods accounting for the -10 dB off beam pattern adjustment and a 6-foot tall person at ground level at the base of the tower and results indicate that the requested modification, as proposed, would produce radio frequency emissions with a %MPE of 382.7% for each sector of Verizon's antennas. This exceeds the FCC's allowable General Public/Uncontrolled MPE limit of 100%.

Please refer to the Council's 2015 exempt modification filing memo (link added below) for filing requirements and procedures.

<https://portal.ct.gov/-/media/CSC/Guides/EMFilingMemo111015pdf.pdf>

Therefore, the exempt modification request is incomplete at this time. The Council recommends that Robinson & Cole provide a Radio Frequency Analysis Report for the proposed modifications to the facility with a cumulative %MPE at or below 100%, on or before July 1, 2021. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to July 1, 2021. **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 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,

*s/Melanie Bachman*

Melanie Bachman  
Executive Director

MAB/CW/emr