



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

March 14, 2022

Ersilia Davis
Crown Castle, Agent for AT&T
1 Cityplace Dr., Suite 490
Creve Coeur, MO 63141
edavis@nbcllc.com

RE: **EM-AT&T-155A-220217** – AT&T notice of intent to modify an existing telecommunications facility located at 29 South Main Street, West Hartford, Connecticut.

Dear Ms. Davis:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on February 17, 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 a deficiency in the Radio Frequency Emissions Analysis Report prepared by EBI Consulting, dated January 26, 2022. The Radio Frequency Analysis Report indicates a calculated, Maximum Permissible Exposure (%MPE) of 79.43 % at ground level accounting for both AT&T and Sprint antennas. The tower is located on the top of a parking garage that is accessible to the general public. Council staff calculated the power density for the proposed AT&T modification using the data provided in the report. 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 the base of the tower on the roof of the parking garage (i.e. 40 feet above ground level) results indicate that the requested modification, as proposed, would produce radio frequency emissions with a %MPE of 302.77% for each sector of AT&T's antennas and a cumulative %MPE of 331.35% with Sprint's antennas. See table attached. This exceeds the FCC's allowable General Public/Uncontrolled cumulative 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 Crown Castle provide a rigorous far-field analysis taking into account the actual antenna pattern and accounting for a 6-foot person on the roof of the parking garage with a cumulative %MPE at or below 100%, on or before April 11, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to April 11, 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 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,

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/CW/emr

Cumulative Power Density Table

Control Number	Site	Carrier	#Channels	ERP/Ch (W)	Ant Ht	MHz	Power Density	S	%MPE	Site Total
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	4	719	40	700	0.0895	0.4667	19.17%	
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	2	807	40	700	0.0502	0.4667	10.76%	
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	4	1279	40	1900	0.1592	1.0000	15.92%	
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	4	1114	40	2100	0.1386	1.0000	13.86%	
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	1	31996	40	3700	0.9954	1.0000	99.54%	
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	1	31996	40	3700	0.9954	1.0000	99.54%	
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	4	612	40	700	0.0762	0.4667	16.32%	
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	4	703	40	850	0.0875	0.5667	15.44%	
EM-AT&T-155-210503	West Hartford - 27-31 South Main Street	AT&T	4	983	40	2300	0.1223	1.0000	12.23%	302.77%
EM-Sprint-155-171106	West Hartford - 27-31 South Main Street	Sprint	1	438	52	1900	0.0744	1.0000	0.74%	
EM-Sprint-155-171106	West Hartford - 27-31 South Main Street	Sprint	2	438	52	850	0.1489	0.5667	2.63%	
EM-Sprint-155-171106	West Hartford - 27-31 South Main Street	Sprint	5	623	52	1900	0.5294	1.0000	5.29%	
EM-Sprint-155-171106	West Hartford - 27-31 South Main Street	Sprint	2	1556	52	850	0.5289	0.5667	9.33%	
EM-Sprint-155-171106	West Hartford - 27-31 South Main Street	Sprint	8	778	52	2500	1.0578	1.0000	10.58%	331.35%