



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

December 21, 2021

Ersilia Davis
Crown Castle
1777 Sentry Parkway W
VEVA 17, Suite 400
Blue Bell, PA 19422
edavis@nbcllc.com

RE: **EM-T-MOBILE-155-211122**- Sprint 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 November 22, 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 EBI Consulting, dated November 11, 2021. The Radio Frequency Analysis Report indicates a Maximum Permissible Exposure (MPE) of 22.9 % at 103 feet above ground level. Council staff calculated the power density for the proposed modification using the Federal Communications Commission (FCC) OET Bulletin 65 predictive methods and accounted for the -10 dB off beam pattern adjustment and a 6-foot tall person at the top level of the parking garage at the base of the tower and results indicate that the requested modification, as proposed, would produce radio frequency emissions with a MPE of 101.9% for Sprint/T-Mobile's antennas and a cumulative MPE of 149.8%. 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 Crown Castle provide a Radio Frequency Analysis Report for the proposed modifications to the facility with a cumulative General Public/Uncontrolled MPE at or below 100%, on or before January 20, 2022. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to January 20, 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/FOC/emr