



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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VIA ELECTRONIC MAIL

March 16, 2023

David Barbagallo
Smartlink Group
85 Rangeway Road
Building 3, Suite 102
Billerica, MA
David.Barbagallo@Smartlinkgroup.com

RE: **EM-AT&T-158-230302** – AT&T notice of intent to modify an existing telecommunications facility located at 880 Post Road East, Westport, Connecticut.

Dear David Barbagallo:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on March 2, 2023.

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. the construction drawings dated April 18, 2022 and the Structural Analysis dated July 26, 2022 cite 2018 Connecticut State Building Code (CSBC); however, the State of Connecticut has adopted the 2022 CSBC effective October 1, 2022;
- b. 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. While the radio frequency emissions report provided with the request references "all sources" it appears to include a far-field analysis for AT&T only as it does not list other entities on the tower. A copy of the memorandum is available on the Council's website at the following link: [20220923-farfieldmemo_final.pdf \(ct.gov\)](http://portal.ct.gov/csc/20220923-farfieldmemo_final.pdf);
- c. The construction drawings prepared by Hudson Design Group, LLC., last revised on April 18, 2022, includes a mount note stating "An analysis for the capacity of the existing antenna mount to support the proposed loading has been completed by: Hudson Design Group, LLC. Dated: April 11, 2022 (Rev1)." No mount analysis is included with the request for exempt modification; therefore, it is unclear whether additional reinforcements would be required for the antenna mount, which would alter the proposed loading on the structure; and

- d. On March 2, 2023, the Council approved a Dish tower share request for the same facility. The Structural Analysis for the above-referenced exempt modification does not include Dish's approved equipment. Please see Dish's tower share filing for this facility, which may be found on the Council's website under the Decisions page in Westport under the filing number TS-DISH-158-230202 or by following the link: [TS-DISH-158-230202_filing_515PostRdEast_Westport.pdf \(ct.gov\)](#).

Therefore, the exempt modification request is incomplete at this time. The Council recommends that AT&T provide an updated construction drawings and Structural Analysis that includes proposed and approved equipment owned and operated by AT&T and other entities that are located at this facility and that comport with the current 2022 CSBC; and a Mount Analysis for the proposed equipment that is stamped and signed by a professional engineer duly licensed in the State of Connecticut; and an RF Analysis including a rigorous cumulative far-field analysis for all entities located 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%; on or before April 17, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to April 17, 2023. **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 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,



Melanie Bachman
Executive Director

MAB/ANM/laf