



STATE OF CONNECTICUT  
*CONNECTICUT SITING COUNCIL*

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**VIA ELECTRONIC MAIL**

November 30, 2022

David Barbagallo  
Smartlink LLC  
85 Rangeway Road  
Building 3, Suite 102  
North Billerica, MA 01862-2105  
[david.barbagallo@smartlinkgroup.com](mailto:david.barbagallo@smartlinkgroup.com)

RE: **EM-AT&T-163-221118** – AT&T notice of intent to modify an existing telecommunications facility located 83 Windham Street, Windham, Connecticut.

Dear David Barbagallo:

The Connecticut Siting Council (Council) received a notice of intent to modify the above-referenced facility on November 18, 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 the following deficiencies:

- a) 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. The radio frequency emissions report dated October 5, 2022 provided with the request does not include a cumulative far-field analysis. A copy of the memorandum is available on the Council's website at the following link: [20220923-farfieldmemo\\_final.pdf \(ct.gov\)](#).
- b) The construction drawings dated August 23, 2022 cite the 2015 International Building Code (IBC) and 2018 Connecticut State Building Code (CSBC); however, the State of Connecticut has adopted the 2022 CSBC effective October 1, 2022 (which incorporates the 2021 IBC); and
- c) The Structural Analysis dated November 11, 2022 cites the 2015 IBC; however, the most current code is the 2021 IBC.

Therefore, the exempt modification request is incomplete at this time. The Council recommends that AT&T provide a revised Radio Frequency 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%, and an updated Structural Analysis and construction drawings that comport with the current 2022 CSBC/2021 IBC on or before January 3, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to January 3, 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,

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