



STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051
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VIA ELECTRONIC MAIL

March 1, 2023

Katie Adams
SR Site Acquisition Specialist
Network Building & Consulting
100 Apollo Drive, Suite 303
Chelmsford, MA 01824
kadams@nbcllc.com

RE: **TS-VER-168-221122** - Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 85 Paper Mill Road, Woodbury, Connecticut.

Dear Katie Adams:

The Connecticut Siting Council (Council) received a tower share request for the above-referenced facility on November 22, 2022. On December 15, 2022 the Council issued a letter (enclosed) stating that the tower share request was incomplete because the RF analysis provided does not provide a rigorous cumulative far-field analysis for all entities located on the tower and the Structural Analysis (SA), Construction Drawings (CDs) and Mount Analysis (MA) cite the 2018 Connecticut State Building Code (CSBC) or/and 2015 International Building Code (IBC); however, the State of Connecticut has adopted the 2021 IBC as amended in the 2022 CSBC effective October 1, 2022. The Council recommended that Verizon provide a rigorous cumulative far-field analysis that includes all entities located on the tower and 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 MA, SA and CDs that comport with the current 2021 IBC/2022 CSBC on or before January 23, 2023.

On February 24, 2023, the Council received an electronic mail with a CD last revised on November 18, 2022, a SA dated February 1, 2023, and a far field RF analysis. However, no MA was provided and the RF analysis does not reference the other entities on the tower.

Therefore, the tower share request remains incomplete at this time. The Council recommends that Verizon provide an RF analysis that includes all entities located on the tower and 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 a MA that comports with the current 2021 IBC/2022 CSBC on or before March 31, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to March 31, 2023. **Please provide an electronic version and one hard copy of the requested information for the incomplete tower share request to be rendered complete and processed. Please include the Council's tower share 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

MAB/IN/laf

Enclosure: Incomplete letter dated December 15, 2022

VIA ELECTRONIC MAIL

December 15, 2022

Katie Adams
SR Site Acquisition Specialist
Network Building & Consulting
100 Apollo Drive, Suite 303
Chelmsford, MA 01824
kadams@nbcllc.com

RE: **TS-VER-168-221122** - Cellco Partnership d/b/a Verizon Wireless notice of intent to modify an existing telecommunications facility located at 85 Paper Mill Road, Woodbury, Connecticut.

Dear Katie Adams:

The Connecticut Siting Council (Council) received a tower share request for the above-referenced facility on November 22, 2022.

According to Section 16-50j-90 of the Regulations of Connecticut State Agencies, “no tower share application shall be approved until a complete application containing all information deemed relevant by the Council has been filed. Relevant information shall at a minimum include that listed in Section 16-50j-89 of the Regulations of Connecticut State Agencies...”

Staff has reviewed this tower share request for completeness and has identified some deficiencies in the request. 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 tower share requests. The RF analysis provided in Exhibit F of the tower share request indicates a near field %MPE value for Verizon and does not provide a rigorous cumulative far-field analysis for all entities located on the tower. A copy of the memorandum is available on the Council’s website at the following link: https://portal.ct.gov/-/media/CSC/Guides/2022/20220923-farfieldmemo_final.pdf .

In addition, the Structural Analysis (SA), Construction Drawings (CDs) and Mount Analysis (MA) dated July 1, 2022, September 29, 2022, and September 7, 2022, respectively, cite the 2018 Connecticut State Building Code (CSBC) or/and 2015 International Building Code (IBC); however, the State of Connecticut has adopted the 2021 IBC as amended in the 2022 CSBC effective October 1, 2022.

Therefore, the tower share request is incomplete at this time. The Council recommends that Verizon provide a rigorous cumulative far-field analysis that includes all entities located on the tower and 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 MA, SA and CDs that comport with the current 2021 IBC/2022 CSBC on or before January 23, 2023. If additional time is needed to gather the requested information, please submit a written request for an extension of time prior to January 23, 2023. **Please provide an electronic version and one hard copy of the requested information for the incomplete tower share request to be rendered complete and processed. Please include the Council’s tower share identification number referenced above with the submittal.**

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