

THOMAS J. REGAN direct dial: 860.509.6522 fax: 860.509.6622 tregan@brownrudnick.com

September 1, 2021

#### VIA E-MAIL & OVERNIGHT MAIL

Attorney Melanie Bachman Executive Director Connecticut Siting Council Ten Franklin Square New Britain, CT 06051

# Re: PETITION No. 1461 – SBA Communications Corporation petition for a declaratory ruling for the proposed replacement and extension of an existing telecommunications facility located at 130 Welles Road, Groton, Connecticut / <u>New Cingular Wireless PCS, LLC's Petition to Intervene</u>

Dear Attorney Bachman:

On behalf of New Cingular Wireless PCS, LLC ("AT&T"), please find enclosed an original

and 15 copies of our Petition to Intervene in the above-mentioned docket.

Sincerely,

<u>/s/ Thomas J. Regan</u> Thomas J. Regan

Encl.

cc: Kenneth C. Baldwin, Esq., via e-mail

64145249 v1-WorkSiteUS-024519/1643

## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN	RE:	

SBA COMMUNICATIONS CORPORATION'S	:	PETITION NO. 1461
PETITION FOR A DECLARATORY RULING	:	
FOR THE PROPOSED REPLACEMENT AND	:	
EXTENSION OF AN EXISTING	:	
TELECOMMUNICATIONS FACILITY	:	
LOCATED AT 130 WELLES ROAD, GROTON,	:	
CONNECTICUT	:	SEPTEMBER 1, 2021

## PETITION TO INTERVENE IN THIS PROCEEDING BY NEW CINGULAR WIRELESS PCS, LLC ("AT&T")

New Cingular Wireless PCS, LLC d/b/a AT&T ("AT&T") respectfully requests permission of the Connecticut Siting Council (the "Council") to participate as an intervenor in the application and hearing process for Petition No. 1461, pursuant to Section 16-50n of the Connecticut General Statutes (henceforth, the "C.G.S.") and Section 16-50j-15 of the Regulations of Connecticut State Agencies (hereinafter, the "R.C.S.A.").

AT&T is licensed by the Federal Communications Commission (the "FCC") to construct and operate wireless communications networks that offer enhanced wireless communication services to the public throughout the United States of America, including the State of Connecticut. AT&T will be a tenant on the proposed replacement tower. AT&T's proposed wireless telecommunications facility would be incorporated into AT&T's wireless network. AT&T has an interest in the application process to assist the Council in evaluating the public interest and need considerations set forth in Sections 16-50g and 16-50aa of the C.G.S. As described within the application materials submitted to the Council by SBA Communications Corporation (the "Applicant"), AT&T's network currently has an area of deficient coverage in Groton, Connecticut along State Route 184, at the intersection of State Route 184 and Cow Hill Road, along Shewville Road, and the surrounding residences and businesses in this area. Therefore, AT&T has an interest and need for a wireless facility on the replacement tower in this area of Groton in order to provide wireless communications services. AT&T's wireless facility on the existing tower was installed as a temporary solution to replace AT&T's coverage from its wireless facility on a nearby water tower located at 35 Nantucket Drive in Mystic Connecticut which was demolished. A wireless facility on the replacement monopole at the proposed height will help AT&T provide the necessary coverage.

The Council has admitted AT&T as an intervenor in previous petitions and dockets. AT&T requests that it be named as an intervenor and be granted permission to participate in this proceeding in support of the need to provide wireless communications services coverage in this area of the State of Connecticut.

Respectfully submitted,

New Cingular Wireless PCS, LLC

By: <u>/s/Thomas J. Regan</u>

Thomas J. Regan, Esq. Brown Rudnick LLP 185 Asylum Road Hartford, CT 06103 (860) 509-6527 tregan@brownrudnick.com

## **CERTIFICATE OF SERVICE**

I hereby certify that on this day, and electronic copy of the foregoing was sent to the following:

Kenneth C. Baldwin, Esq. Robinson & Cole LLP 280 Trumball Street Hartford, CT 06103-3597 (860)275-8200 kbaldwin@rc.com

Dated: September 1, 2021

<u>/s/Thomas J. Regan</u> Thomas J. Regan, Esq.

cc: Brian Leyden, AT&T Lynn Brady, AT&T Edward D. Pare, Jr., Esq., Brown Rudnick LLP SAI Group, LLC C Squared Systems, LLC

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