STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

NEW CINGULAR WIRELESS PCS, LLC (AT&T) PETITION FOR A DECLARATORY RULING, PURSUANT TO CONNECTICUT GENERAL STATUTES §4-176 AND §16-50K, FOR THE INSTALLATION OF A SMALL CELL WIRELESS TELECOMMUNICATIONS FACILITY IN THE PUBLIC RIGHT-OF-WAY NEAR 80 ALLINGS CROSSING ROAD IN WEST HAVEN, CONNECTICUT.

PETITION NO._____

MAY 10, 2022

PETITION FOR A DECLARATORY RULING: INSTALLATION HAVING NO SUBSTANTIAL ADVERSE ENVIRONMENTAL EFFECT

I. <u>Introduction</u>

Pursuant to Section 16-50j-38 and 16-50j-39 of the Regulations of Connecticut State Agencies ("R.C.S.A."), New Cingular Wireless PCS LLC ("AT&T") hereby petitions the Connecticut Siting Council (the "Council") for a declaratory ruling ("Petition") that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required under Section 16-50k(a) of the Connecticut General Statutes ("C.G.S.") to install a new "small cell" wireless telecommunications facility on a new pole within the public right-of-way near 80 Allings Crossing Road near the Metro-North Railroad and I-95 in the City of West Haven, Connecticut (the "Site"). AT&T proposes to install an approximately 50'-tall Class 2 utility pole that will stand approximately 43'-tall above grade level ("AGL"). Two small square shaped panel antennas will be mounted to the top of the new utility pole at a centerline height of 44'-6" AGL with a total height of 45'-6" AGL to the top of the cabinet is approximately 8' AGL. The utility pole will not support any electrical distribution equipment.

II. <u>Factual Background</u>

a. <u>AT&T's Need for the Proposed Facility</u>

AT&T identified a need for additional coverage and/or capacity relief in its network in this area of the City of West Haven. The proposed Facility is designed to assure reliable wireless service to AT&T customers in this area, including those traveling on the Metro-North Railway and the nearby I-95 corridor. AT&T has considered several alternative locations to the proposed pole, including the nearby utility poles. The existing poles were determined to not be viable alternatives

because the utility would not allow attachments due existing equipment on those poles. No other suitable poles exist that would provide AT&T the network relief sought.

b. <u>AT&T's Proposed "Small Cell" Facility</u>

AT&T proposes to install its small cell Facility on a new 50'-tall Class 2 utility pole which will stand approximately 43' AGL (approximately 7' of the pole will be buried). The proposed pole will be located within the public right-of-way near the Metro-North Railroad and in the vicinity of several commercial properties.

AT&T's proposed Facility consists of two square-shaped panel antennas mounted to the top of the utility pole at a centerline height of approximately 44'-6" AGL. The proposed antennas are 23.3" in height, 23.3" in width, and 6.0" in depth. AT&T will deploy its 700 MHz, 1900 MHz, and AWS frequencies which will be shared between the two antennas. A proposed equipment cabinet will be mounted to the side of the pole and the bottom of the equipment cabinet will be located approximately 8' AGL. Specifications and details of AT&T's proposed Facility are shown on the drawings included in **Attachment 1** and photosimulations included in **Attachment 2**.

A structural analysis report confirming that the new pole installation will support AT&T's proposed small cell Facility is included in **Attachment 3**. AT&T does not propose any backup power at this location.

c. <u>Council Jurisdiction</u>

Connecticut law confers jurisdiction to the Council over certain "facilities", including "telecommunication towers." C.G.S. §16-50i(a)(6). State regulations define "tower" as a "structure, whether free standing or attached to a building or another structure... used principally to support one or more antennas for receiving or sending radio frequency signals...." R.C.S.A. §16-50j-2a(30)(A). Utility structures used to support electric distribution lines located within the public right-of-way fall under PURA's jurisdiction. Thus, PURA has jurisdiction over small cell facility attachments to utility poles located within the public right-of-way. PURA, Docket 16-06-38.

Here, the proposed utility pole will be "used principally to support one or more antennas for receiving or sending radio frequency signals" and the pole will not, for the foreseeable future, be used as a part of the existing electric distribution system. The proposed utility pole along with AT&T's wireless equipment constitutes a "facility" over which the Council has jurisdiction. This jurisdiction is consistent with the Council's November 5, 2007 Opinion in Petition No. 809.

III. <u>Discussion</u>

a. <u>The Proposed Small Cell Facility Will Not Have A Substantial Environmental</u> <u>Impact</u>

For the reasons set forth below, AT&T respectfully submits that its proposed small cell Facility will not have a substantial environmental impact and as such a Certificate pursuant to C.G.S. Section 16-50k(a) is not required.

i. <u>Physical Environmental Effects</u>

The proposed utility pole and AT&T's installation of antennas and associated radio and electrical equipment will not result in any significant physical and environmental change to the property or any adjacent parcels. The new pole will be within the right-of-way where such poles are common. The Metro-North Railroad is located north and west of the proposed Facility. The immediate vicinity also includes other utility infrastructure including transmission towers and several overhead wires. AT&T's proposed small cell Facility will not require any tree removal and the pole installation involves minimal disturbance. Construction will take place Monday through Friday between the hours of 8:00 a.m. and 5:00 p.m.

ii. <u>Visual Effects</u>

The area immediately surrounding the proposed pole is characterized by commercial development and above-ground utility poles and transmission towers. The Metro-North Railroad is located to the north and west and beyond the railroad is I-95. The proposed pole and Facility are consistent with the existing utility infrastructure in the right-of-way. As shown in the photo-detail included in the photosimulation in **Attachment 2**, the proposed pole and AT&T's small cell Facility will not result in a significant visual impact to the area.

iii. FCC Compliance

The operation of AT&T's antennas will not increase the total radio frequency electromagnetic power density at the site to a level at or above applicable standards. A power density report is included in **Attachment 4** which concludes that the maximum power density at ground/street level from the proposed Facility is 1.41% of the FCC's general public limit. The total radio frequency power density will be well within standards adopted by the Connecticut Department of Environmental Protection as set forth in Section 22a-162 of the Connecticut General Statutes and the MPE limits established by the FCC.

b. Notice to Municipal Officials and Adjoining Landowners

Pursuant to R.C.S.A. Section 16-50j-40(a), notice of AT&T's intent to file this Petition was sent to each person appearing of record as an owner of property that abuts the site, as well as the appropriate municipal officials and government agencies as listed in C.G.S Section 16-50*l*. Certification of such notice, a copy of the notice and the list of property owners is included in **Attachment 5** along with the map used to identify abutting property owners. **Attachment 5** also includes a certification of service to municipal officials and government agencies to whom notice was sent.

IV. <u>Conclusion</u>

As set forth above, AT&T's proposed small cell Facility will not result in any known adverse environmental effects. Therefore, and for all the foregoing reasons, AT&T petitions the Council for a determination that the proposed small cell Facility does not require a Certificate of Environmental Compatibility and Public Need and that the Council issue an order approving same.

Respectfully submitted,

Lucie Chrocchio

Lucia Chiocchio On behalf of the Petitioner

cc: Mayor Nancy R. Rossi, City of West Haven Christopher Soto, Director of Planning & Development, City of West Haven Patricia C. Horvath, City Clerk, City of West Haven AT&T Nexius Meyling Nuñez

ATTACHMENT 1

		PROJECT:	NEW ENGLAND_N
		SITE NAME:	CRAN_RCTB_AMTRK_038
		USID:	299721
		PACE NUMBER:	MRCTB048276
		FA NUMBER:	15360608
		PTN NUMBER:	2051AOWCCZ
		COORDINATES:	41.265445°, -72.973617°
		SITE ADDRESS:	80 ALLINGS CROSSING RO WEST HAVEN, CONNECTICI
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COUNTY:	NEW HAVEN	Ecolemon 33 2 SITE USLAVE	EQ=2 EQUIPMENT DETAILS
JURISDICTION:	CITY OF WEST HAVEN	Philp?	EQ-4 EQUIPMENT DETAILS
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APPLICANT:	NEXIUS SOLUTIONS, INC. 300 APOLLO DRIVE, 2ND FLOOR CHELMSFORD, MA 01824 SITE ACQUISTION: NICOLE CAPLANMASON EMAIL: nicole.caplanmason@nexius.com	W Labs	ALL WORK SHALL BE PERFORMED AND MATERIALS INST EDITIONS OF THE FOLLOWING APPLICABLE CODES AS A AUTHORITIES. • 2018 INTERNATIONAL BUILDING CODE
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ENGINEERING SERVICES:	NEXIUS SOLUTIONS, INC. 2595 NORTH DALLAS PARKWAY, SUITE 300 FRISCO, TX 75034 EMAIL: JACK.PHIPPS O nexius.com	Andrea Di Andrea	
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GENERAL CONSTRUCTION

- ALL SITE WORK SHALL BE COMPLETED AS INDICATED ON THE DRAWINGS AND 1. PROJECT SPECIFICATIONS.
- GENERAL CONTRACTOR SHALL VISIT THE SITE AND FAMILIARIZE HIMSELF WITH ALL CONDITIONS AFFECTING THE PROPOSED WORK. GENERAL CONTRACTOR IS 2. RESPONSIBLE FOR FAMILIARIZING HIMSELF WITH ALL CONTRACT DOCUMENTS. FIELD CONDITIONS, DIMENSIONS, AND CONFIRMING THAT THE WORK MAY BE ACCOMPLISHED AS SHOWN PRIOR TO PROCEEDING WITH CONSTRUCTION. ANY DISCREPANCIES SHALL BE BROUGHT TO THE ATTENTION OF THE ENGINEER PRIOR TO THE COMMENCEMENT OF WORK
- ALL MATERIALS FURNISHED AND INSTALLED SHALL BE IN STRICT ACCORDANCE WITH 3. ALL APPLICABLE CODES, REGULATIONS, ORDINANCES, AND ISSUE ALL APPROPRIATE NOTICES.
- ALL WORK CARRIED OUT SHALL COMPLY WITH ALL APPLICABLE MUNICIPAL AND UTILITY COMPANY SPECIFICATIONS AND LOCAL JURISDICTIONAL CODES, ORDINANCES, AND APPLICABLE REGULATIONS.
- PLANS ARE NOT TO BE SCALED. SPACING BETWEEN EQUIPMENT IS THE MINIMUM REQUIRED CLEARANCE. THEREFORE, IT IS CRITICAL TO FIELD VERIFY DIMENSIONS, SHOULD THERE BE ANY QUESTIONS REGARDING THE CONTRACT DOCUMENTS, THE 5. CONTRACTOR SHALL BE RESPONSIBLE FOR OBTAINING A CLARIFICATION FROM THE ENGINEER PRIOR TO PROCEEDING WITH THE WORK. DETAILS ARE INTENDED TO SHOW DESIGN INTENT. MODIFICATIONS MAY BE REQUIRED TO SUIT JOB DIMENSIONS OR CONDITIONS AND SUCH MODIFICATIONS SHALL BE INCLUDED AS PART OF WORK AND PREPARED BY THE ENGINEER PRIOR TO PROCEEDING WITH WORK.
- THE CONTRACTOR SHALL INSTALL ALL EQUIPMENT AND MATERIALS IN ACCORDANCE 6. WITH MANUFACTURER'S RECOMMENDATIONS UNLESS SPECIFICALLY STATED OTHERWISE.
- IF THE SPECIFIED EQUIPMENT CANNOT BE INSTALLED AS SHOWN ON THESE DRAWINGS, THE CONTRACTOR SHALL PROPOSE AN ALTERNATIVE INSTALLATION SPACE FOR APPROVAL BY THE ENGINEER PRIOR TO PROCEEDING. 7.
- CONTRACTOR SHALL NOTIFY THE GENERAL CONTRACTOR OF ANY EXISTING CONDITIONS THAT DEVIATE FROM THE DRAWINGS PRIOR TO BEGINNING CONSTRUCTION.
- GENERAL CONTRACTOR SHALL BE RESPONSIBLE FOR THE SAFETY OF WORK AREA. 9. ADJACENT AREAS AND BUILDING OCCUPANTS THAT ARE LIKELY TO BE AFFECTED BY THE WORK UNDER THIS CONTRACT. WORK SHALL CONFIRM TO ALL OSHA REQUIREMENTS AND THE LOCAL JURISDICTION.
- 10. GENERAL CONTRACTOR SHALL COORDINATE WORK AND SCHEDULE WORK ACTIVITIES WITH OTHER DISCIPLINES.
- WORK SHALL BE DONE IN A PROFESSIONAL MANNER BY COMPETENT EXPERIENCED PERSONNEL IN ACCORDANCE WITH APPLICABLE CODES AND THE BEST ACCEPTED PRACTICE.
- 12. SEAL PENETRATIONS THROUGH FIRE RATED AREAS WITH UL LISTED MATERIALS APPROVED BY LOCAL JURISDICTION. CONTRACTOR SHALL KEEP AREA CLEAN, HAZARD FREE. AND DISPOSE OF ALL DEBRIS.
- 13. CONTRACTOR SHALL PROVIDE WRITTEN NOTICE TO THE CONSTRUCTION MANAGER 48 HOURS PRIOR TO COMMENCEMENT OF WORK.
- 14. THE CONTRACTOR SHALL PROTECT EXISTING IMPROVEMENTS, PAVEMENTS, CURBS, LANDSCAPING AND STRUCTURES. ANY DAMAGED PART SHALL BE REPAIRED AT CONTRACTOR'S EXPENSE TO THE SATISFACTION OF THE OWNER.
- 15. THE CONTRACTOR SHALL CONTACT UTILITY LOCATING SERVICES PRIOR TO THE START OF CONSTRUCTION.
- 16. GENERAL CONTRACTOR SHALL COORDINATE AND MAINTAIN ACCESS FOR ALL TRADES AND CONTRACTORS TO THE SITE AND/OR BUILDING.
- 17. THE GENERAL CONTRACTOR SHALL BE RESPONSIBLE FOR SECURITY OF THE SITE FOR THE DURATION OF CONSTRUCTION UNTIL JOB COMPLETION.
- CONTRACTORS SHALL BE RESPONSIBLE FOR OBTAINING ALL PERMITS AND INSPECTIONS REQUIRED FOR CONSTRUCTION. IF CONTRACTOR CANNOT OBTAIN A PERMIT. THEY MUST NOTIFY THE GENERAL CONTRACTOR IMMEDIATELY.
- 19. THE GENERAL CONTRACTOR SHALL MAINTAIN IN GOOD CONDITION ONE COMPLETE SET OF PLANS WITH ALL REVISIONS, ADDENDA, AND CHANGE ORDERS ON THE PREMISES AT ALL TIMES.
- 20. THE GENERAL CONTRACTOR SHALL PROVIDE PORTABLE FIRE EXTINGUISHERS WITH A RATING OF NOT LESS THAN 2-A TO 2-A:10-B:C AND SHALL BE WITHIN 25 FEET OF TRAVEL DISTANCE TO ALL PORTIONS OF WHERE THE WORK IS BEING COMPLETED DURING CONSTRUCTION.
- 21. ALL EXISTING ACTIVE SEWER, WATER, GAS, ELECTRIC, COMMUNICATIONS, AND OTHER UTILITIES SHALL BE PROTECTED AT ALL TIMES, AND WHERE REQUIRED FOR THE PROPER EXECUTION OF THE WORK, SHALL BE RELOCATED AS DIRECTED BY THE ENGINEER. EXTREME CAUTION SHOULD BE USED BY THE CONTRACTOR WHEN EXCAVATING OR DRILLING PIERS AROUND OR NEAR UTILITIES. CONTRACTOR SHALL PROVIDE SAFETY TRAINING FOR THE WORKING CREW. THIS SHALL INCLUDE BUT NOT BE LIMITED TO: FALL PROTECTION, CONFINED SPACE, ELECTRICAL SAFETY, AND TRENCHING / EXCAVATION.
- ALL EXISTING INACTIVE SEWER, WATER, GAS, ELECTRIC, AND OTHER UTILITIES WHICH 22. INTERFERE WITH THE EXECUTION OF THE WORK, SHALL BE REMOVED, CAPPED, PLUGGED OR OTHERWISE DISCONNECTED AT POINTS WHICH WILL NOT INTERFERE WITH THE EXECUTION OF THE WORK, AS DIRECTED BY THE RESPONSIBLE ENGINEER, AND SUBJECT TO THE APPROVAL OF THE OWNER AND/OR LOCAL UTILITIES.

- 23. CONTRACTOR SHALL MINIMIZE DISTURBANCE TO THE EXISTING SITE DURING CONSTRUCTION. EROSION CONTROL MEASURES, IF REQUIRED DURING CONSTRUCTION, SHALL BE IN CONFORMANCE WITH THE FEDERAL AND LOCAL JURISDICTION FOR EROSION AND SEDIMENT CONTROL.
- 24. THE AREAS OF THE OWNER'S PROPERTY DISTURBED BY THE WORK SHALL BE GRADED TO A UNIFORM SLOPE AND STABILIZED TO PREVENT EROSION.
- 25. NO FILL OR EMBANKMENT MATERIAL SHALL BE PLACED ON FROZEN GROUNDING. FROZEN MATERIALS, SNOW OR ICE SHALL NOT BE PLACED IN ANY FILL OR EMBANKMENT.
- 26. THE SUBGRADE SHALL BE BROUGHT TO A SMOOTH UNIFORM GRADE AND COMPACTED TO 95 PERCENT STANDARD PROCTOR DENSITY UNDER PAVEMENT AND STRUCTURES AND 80 PERCENT STANDARD PROCTOR DENSITY IN OPEN SPACE.
- 27. ALL TRENCHES IN PUBLIC RIGHT OF WAY SHALL BE BACKFILLED WITH FLOWABLE FILL OR OTHER MATERIAL PRE-APPROVED BY THE LOCAL JURISDICTION.
- 28. ALL NECESSARY RUBBISH, STUMPS, DEBRIS, STICKS, STONES, AND OTHER REFUSE SHALL BE REMOVED FROM THE SITE AND DISPOSED OF IN A LAWFUL MANNER.
- 29. ALL BROCHURES, OPERATING AND MAINTENANCE MANUALS, CATALOGS, SHOP DRAWINGS, AND OTHER DOCUMENTS SHALL BE TURNED OVER TO THE GENERAL CONTRACTOR AT COMPLETION OF CONSTRUCTION AND PRIOR TO PAYMENT.
- CONTRACTOR SHALL SUBMIT A COMPLETE SET OF AS-BUILT REDLINES TO THE 30. GENERAL CONTRACTOR UPON COMPLETION OF PROJECT AND PRIOR TO FINAL PAYMENT.
- 31. NO OUTDOOR STORAGE OR SOLID WASTE CONTAINERS ARE PROPOSED.
- 32. ALL MATERIAL SHALL BE FURNISHED AND WORK SHALL BE PERFORMED IN ACCORDANCE WITH THE LATEST GROUNDING STANDARD.
- 33. CONTRACTOR SHALL REMOVE ALL TRASH AND DEBRIS FROM THE SITE ON A DAILY BASIS.
- 34. INFORMATION SHOWN ON THESE DRAWINGS WAS OBTAINED FROM SITE VISITS AND/OR DRAWINGS PROVIDED BY THE SITE OWNER.
- 35. CONTRACTORS SHALL NOTIFY THE ENGINEER OF ANY DISCREPANCIES PRIOR TO ORDERING MATERIAL OR PROCEEDING WITH CONSTRUCTION.
- 36. ALL CABLE INSTALLATIONS TO FOLLOW MANUFACTURER'S INSTRUCTIONS AND RECOMMENDATIONS.

ANTENNA MOUNTING

- DESIGN AND CONSTRUCTION OF ANTENNA SUPPORTS SHALL CONFORM TO CURRENT ANSI/TIA-222 OR APPLICABLE LOCAL CODES.
- ALL STEEL MATERIALS SHALL BE GALVANIZED AFTER FABRICATION IN ACCORDANCE 2. WITH ASTM A123 "ZINC (HOT-DIP GALVANIZED) COATINGS ON IRON AND STEEL PRODUCTS", UNLESS NOTED OTHERWISE.
- 3. ALL BOLTS, ANCHORS AND MISCELLANEOUS HARDWARE SHALL BE GALVANIZED IN ACCORDANCE WITH ASTM A153 "ZINC-COATING (HOT-DIP) ON IRON AND STEEL HARDWARE", UNLESS NOTED OTHERWISE.
- DAMAGED GALVANIZED SURFACES SHALL BE REPAIRED BY COLD GALVANIZING IN 4. ACCORDANCE WITH ASTM A780.
- ALL ANTENNA MOUNTS SHALL BE INSTALLED WITH LOCK NUTS, DOUBLE NUTS AND 5. SHALL BE TORQUED TO MANUFACTURER'S RECOMMENDATIONS.
- CONTRACTOR SHALL INSTALL ANTENNA PER MANUFACTURER'S RECOMMENDATION FOR 6. INSTALLATION AND GROUNDING.
- 7. PRIOR TO SETTING ANTENNA AZIMUTHS AND DOWNTILTS, ANTENNA CONTRACTOR SHALL CHECK THE ANTENNA MOUNT FOR TIGHTNESS AND ENSURE THAT THEY ARE PLUMB. ANTENNA AZIMUTHS SHALL BE SET FROM TRUE NORTH AND BE ORIENTED WITHIN +/- 5% AS DEFINED BY THE RFDS. ANTENNA DOWNTILTS SHALL BE WITHIN +/- 0.5% AS DEFINED BY THE RFDS. REFER TO ND-00246.

TORQUE REQUIREMENTS

- ALL RF CONNECTIONS SHALL BE TIGHTENED WITH A TORQUE WRENCH AND A TORQUE MARK INDICATED ON BOTH SIDES OF THE CONNECTION.
- ALL GROUNDING AND ANTENNA HARDWARE SHALL ALL BE TIGHTENED WITH A TORQUE WRENCH AND A TORQUE MARK INDICATED ON THE NUT SIDE STARTING FROM THE 2. THREADS TO THE SOLID SURFACE. TORQUE TO THE FOLLOWING VALUES:
 - 2.1. ALL 5/16" ANTENNA HARDWARE TIGHTENED TO 9 FT-LBS.
 - 2.2. ALL 1/2" ANTENNA HARDWARE TIGHTENED TO 43 FT-LBS.
 - ALL DIN-TYPE CONNECTIONS TIGHTENED TO 18-22 FT-LBS.
 - 2.4. ALL N-TYPE CONNECTIONS TIGHTENED TO 15-20 IN-LBS.

COAXIAL CABLE NOTES

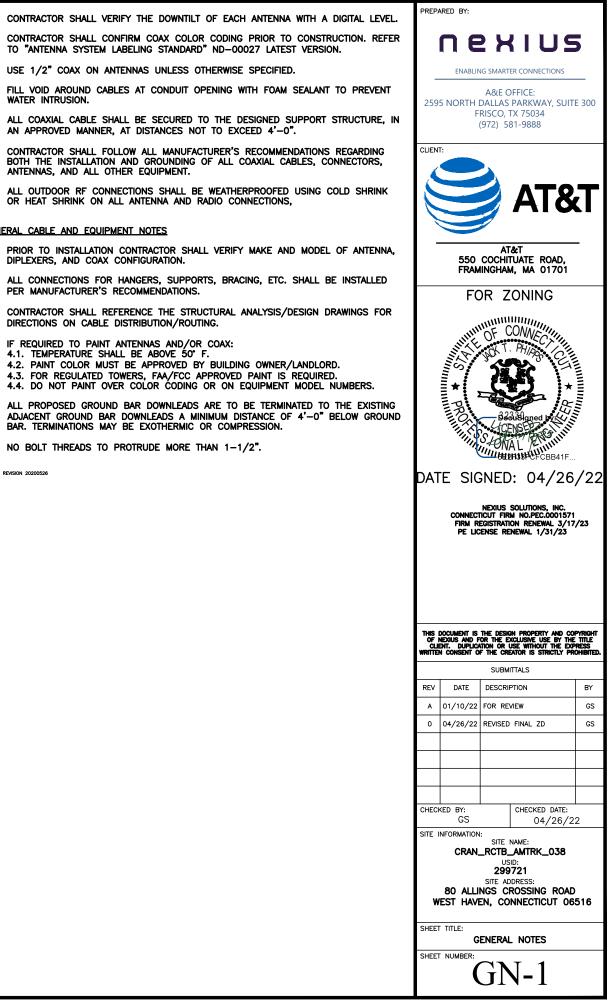
TYPES AND SIZES OF THE ANTENNA CABLE ARE BASED ON ESTIMATED LENGTHS. 1. PRIOR TO ORDERING CABLE, CONTRACTOR SHALL VERIFY ACTUAL LENGTH BASED ON CONSTRUCTION LAYOUT AND NOTIFY THE PROJECT MANAGER IF ACTUAL LENGTHS EXCEED ESTIMATED LENGTHS.

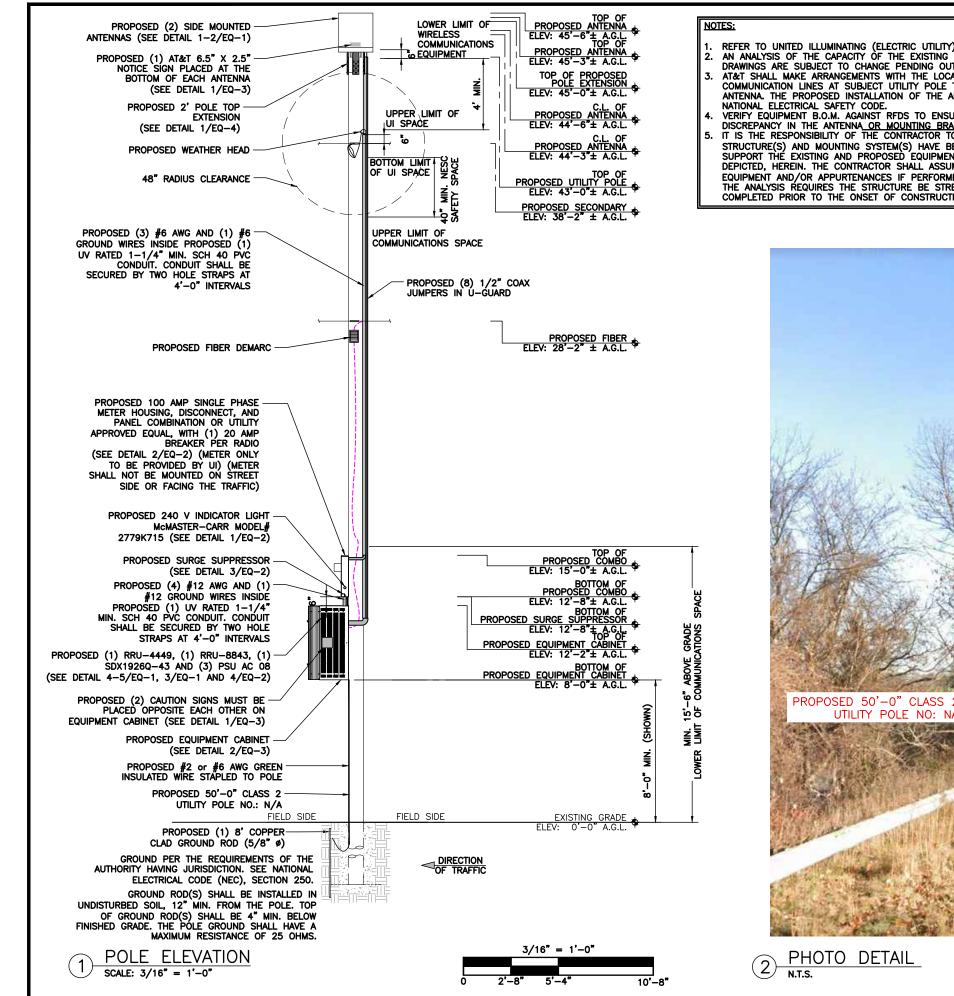
- 2. CONTRACTOR SHALL VERIFY THE DOWNTILT OF EACH ANTENNA WITH A DIGITAL LEVEL.
- 3. TO "ANTENNA SYSTEM LABELING STANDARD" ND-00027 LATEST VERSION.
- USE 1/2" COAX ON ANTENNAS UNLESS OTHERWISE SPECIFIED. 4.
- FILL VOID AROUND CABLES AT CONDUIT OPENING WITH FOAM SEALANT TO PREVENT 5. WATER INTRUSION.
- 6. AN APPROVED MANNER. AT DISTANCES NOT TO EXCEED 4'-0".
- 7. ANTENNAS, AND ALL OTHER EQUIPMENT.
- 8. OR HEAT SHRINK ON ALL ANTENNA AND RADIO CONNECTIONS,

GENERAL CABLE AND EQUIPMENT NOTES

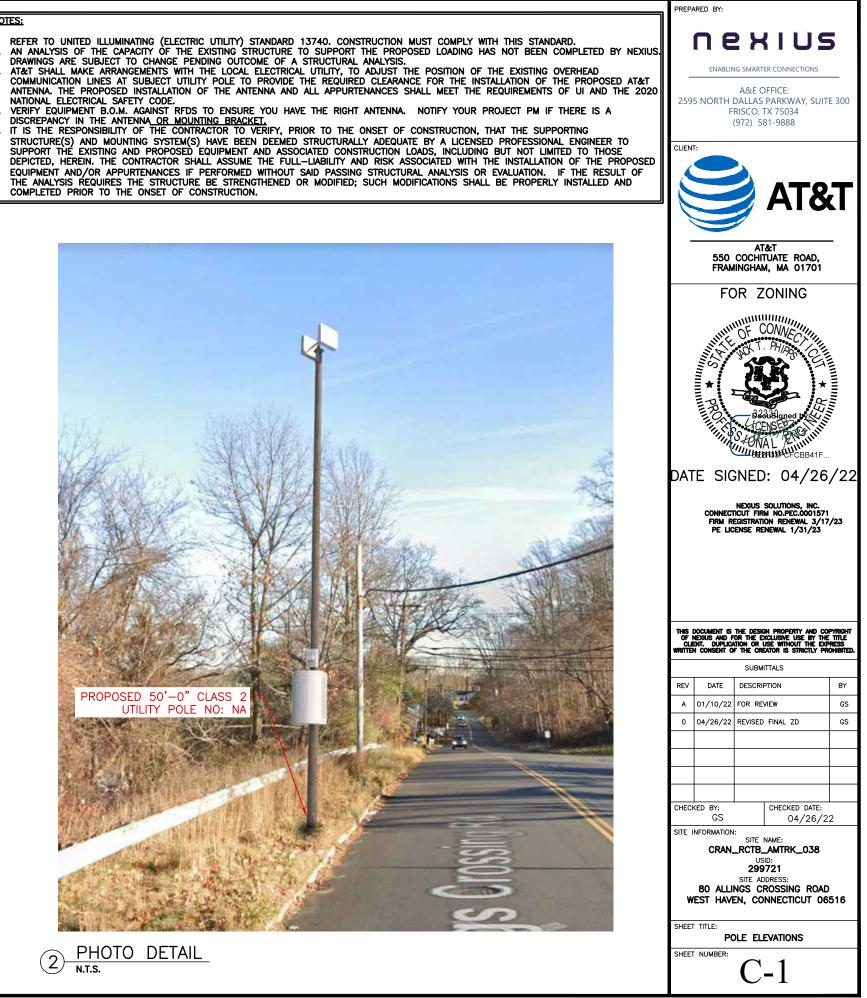
- 1. DIPLEXERS, AND COAX CONFIGURATION.
- PER MANUFACTURER'S RECOMMENDATIONS.
- CONTRACTOR SHALL REFERENCE THE STRUCTURAL ANALYSIS/DESIGN DRAWINGS FOR 3. DIRECTIONS ON CABLE DISTRIBUTION/ROUTING.
- 4. IF REQUIRED TO PAINT ANTENNAS AND/OR COAX: 4.1. TEMPERATURE SHALL BE ABOVE 50° F. 4.2. PAINT COLOR MUST BE APPROVED BY BUILDING OWNER/LANDLORD. 4.3. FOR REGULATED TOWERS, FAA/FCC APPROVED PAINT IS REQUIRED. 4.4. DO NOT PAINT OVER COLOR CODING OR ON EQUIPMENT MODEL NUMBERS.
- ALL PROPOSED GROUND BAR DOWNLEADS ARE TO BE TERMINATED TO THE EXISTING 5. ADJACENT GROUND BAR DOWNLEADS A MINIMUM DISTANCE OF $4^{1}-0^{*}$ below ground bar. Terminations may be exothermic or compression.
- 6. NO BOLT THREADS TO PROTRUDE MORE THAN 1-1/2".

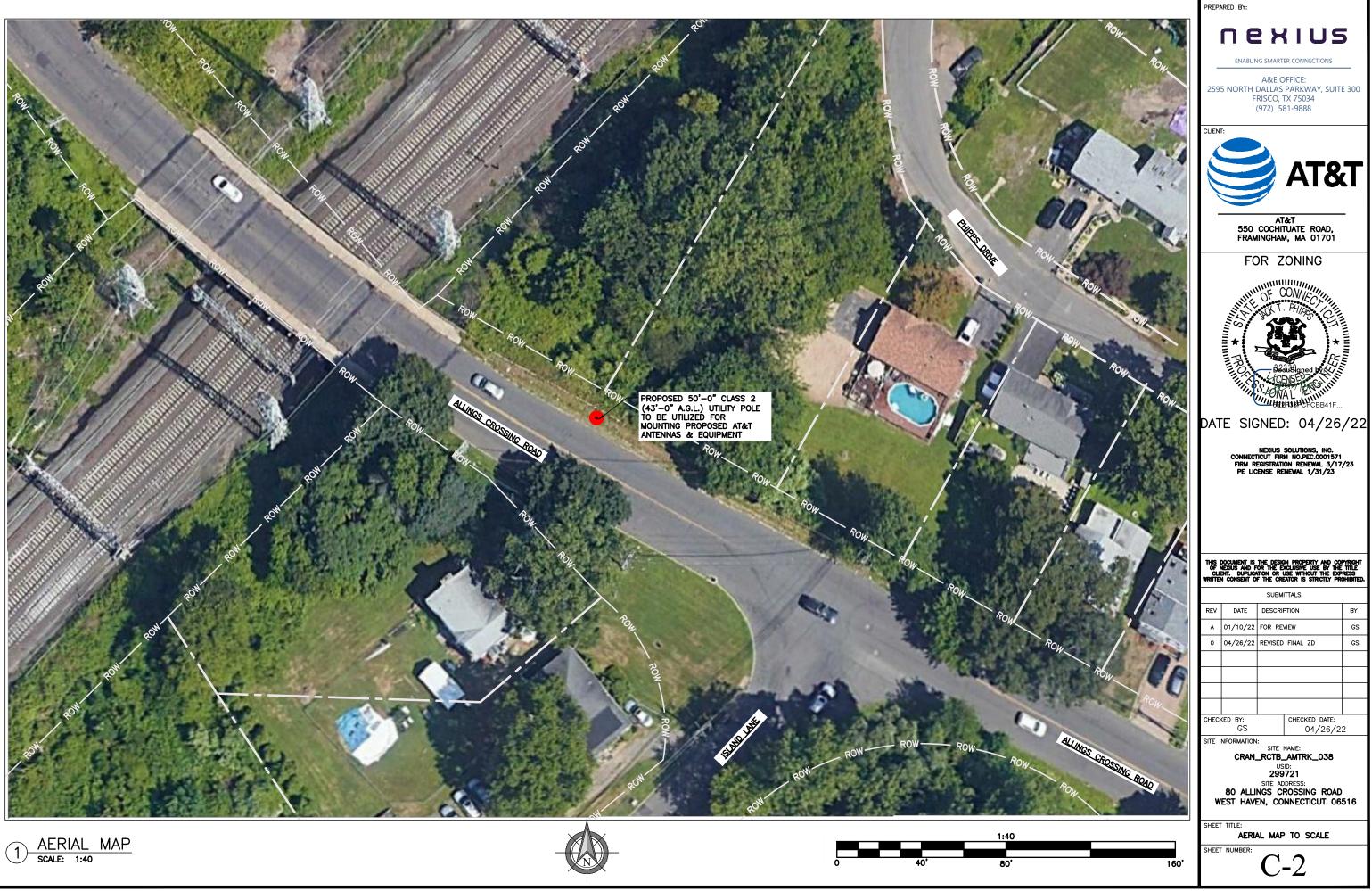
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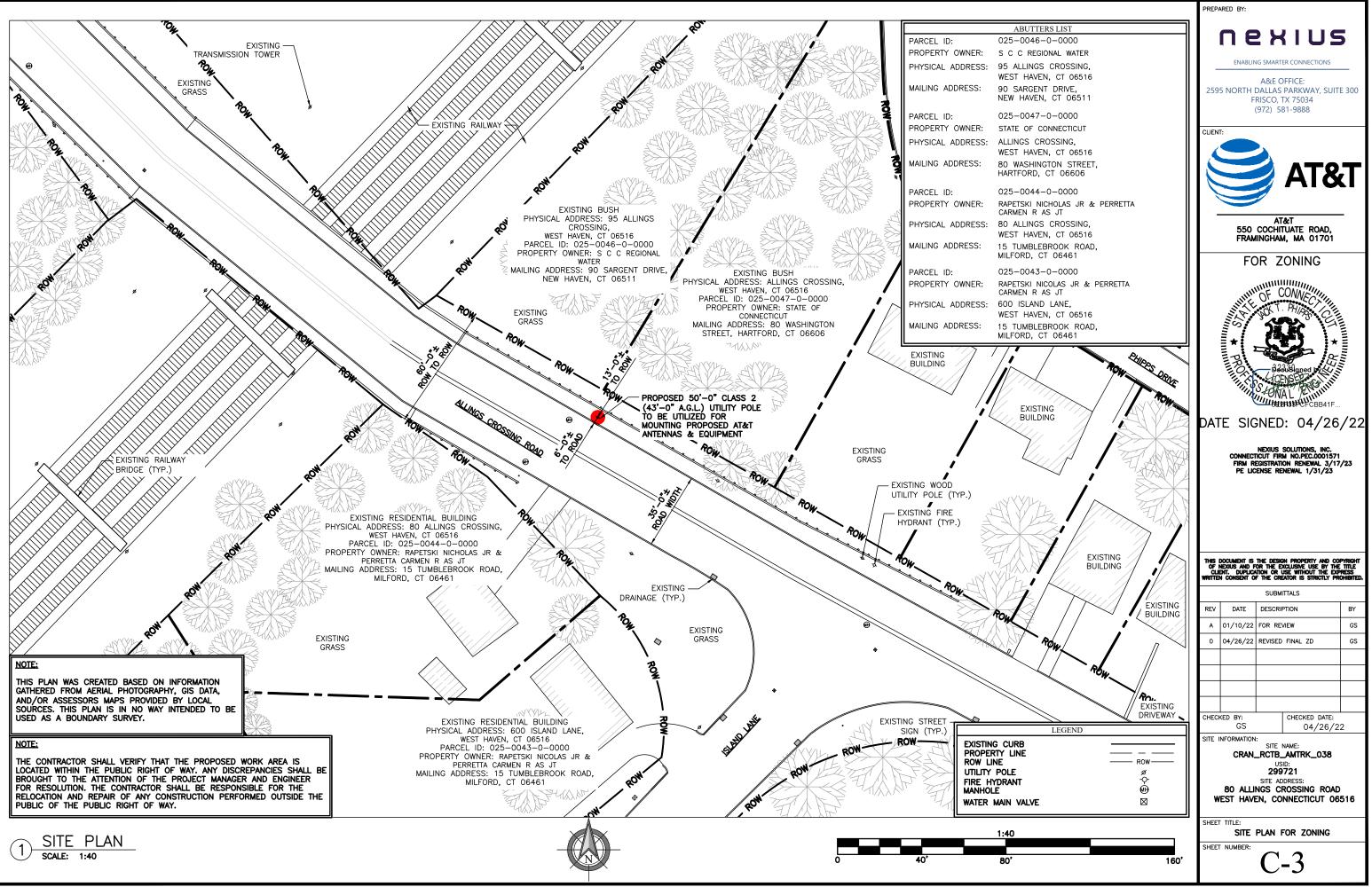


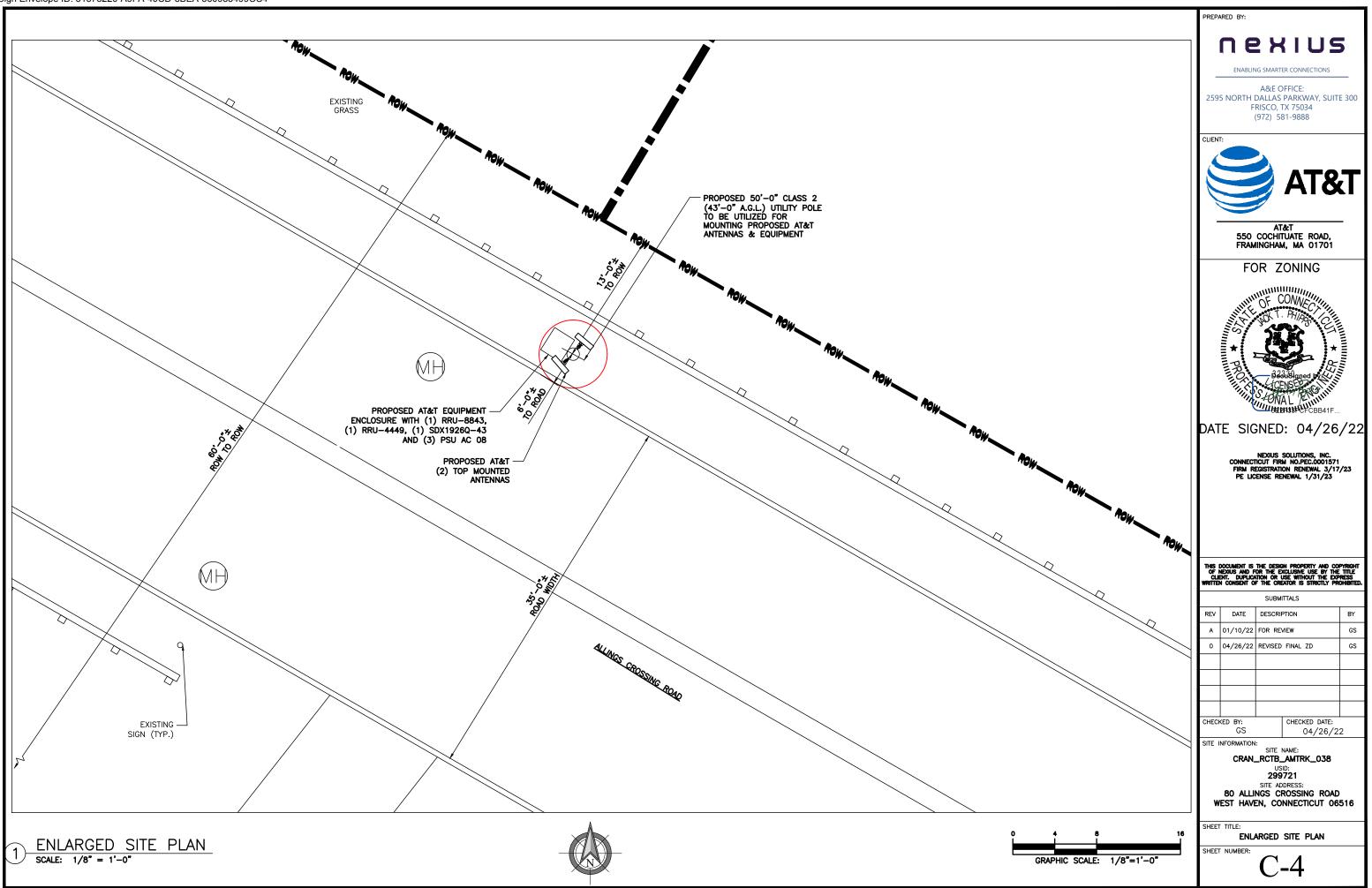


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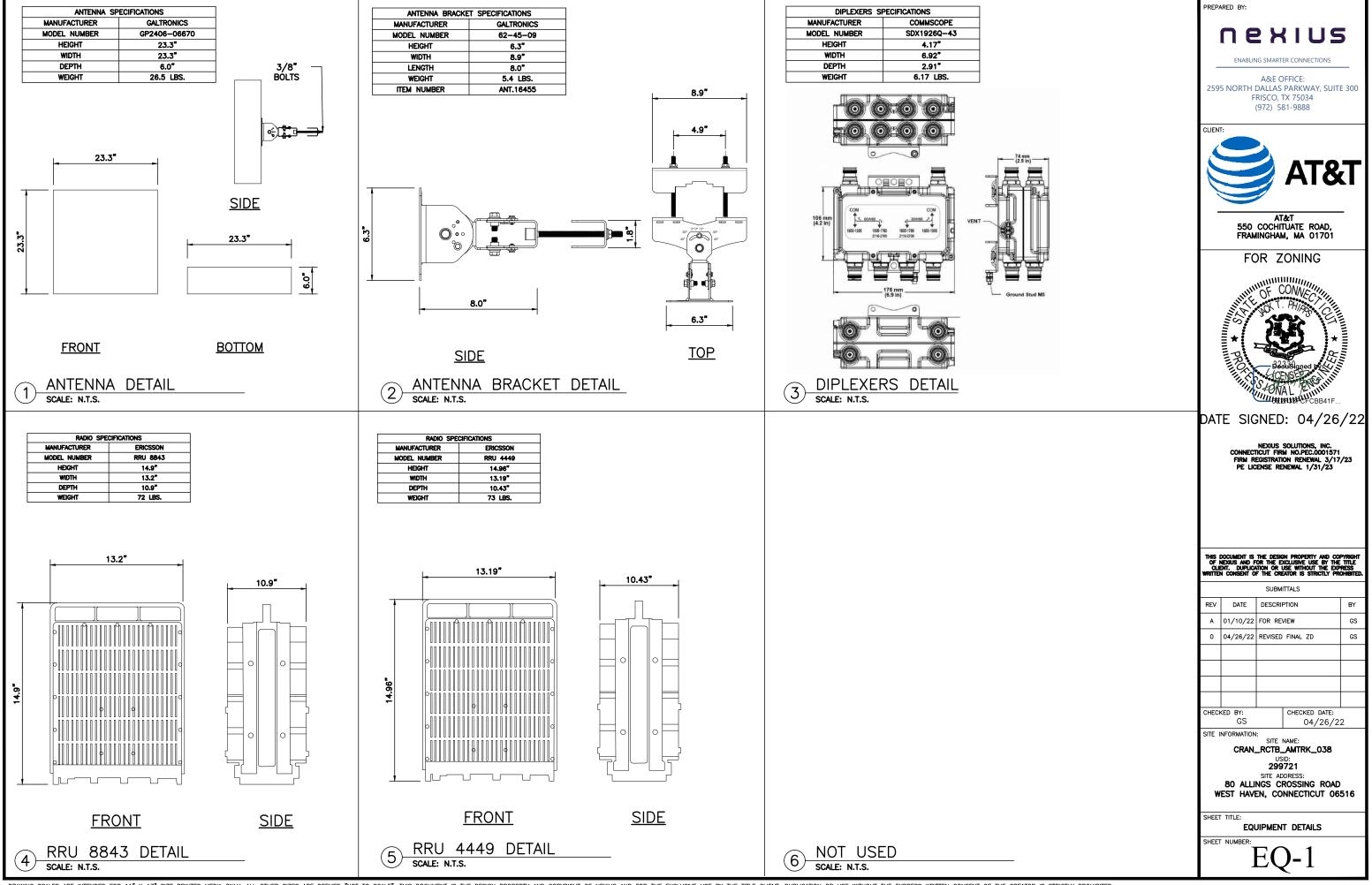








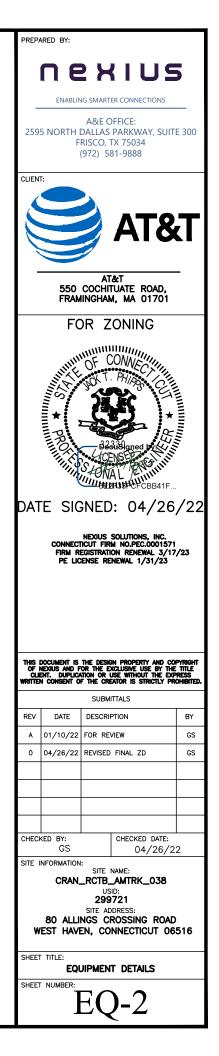
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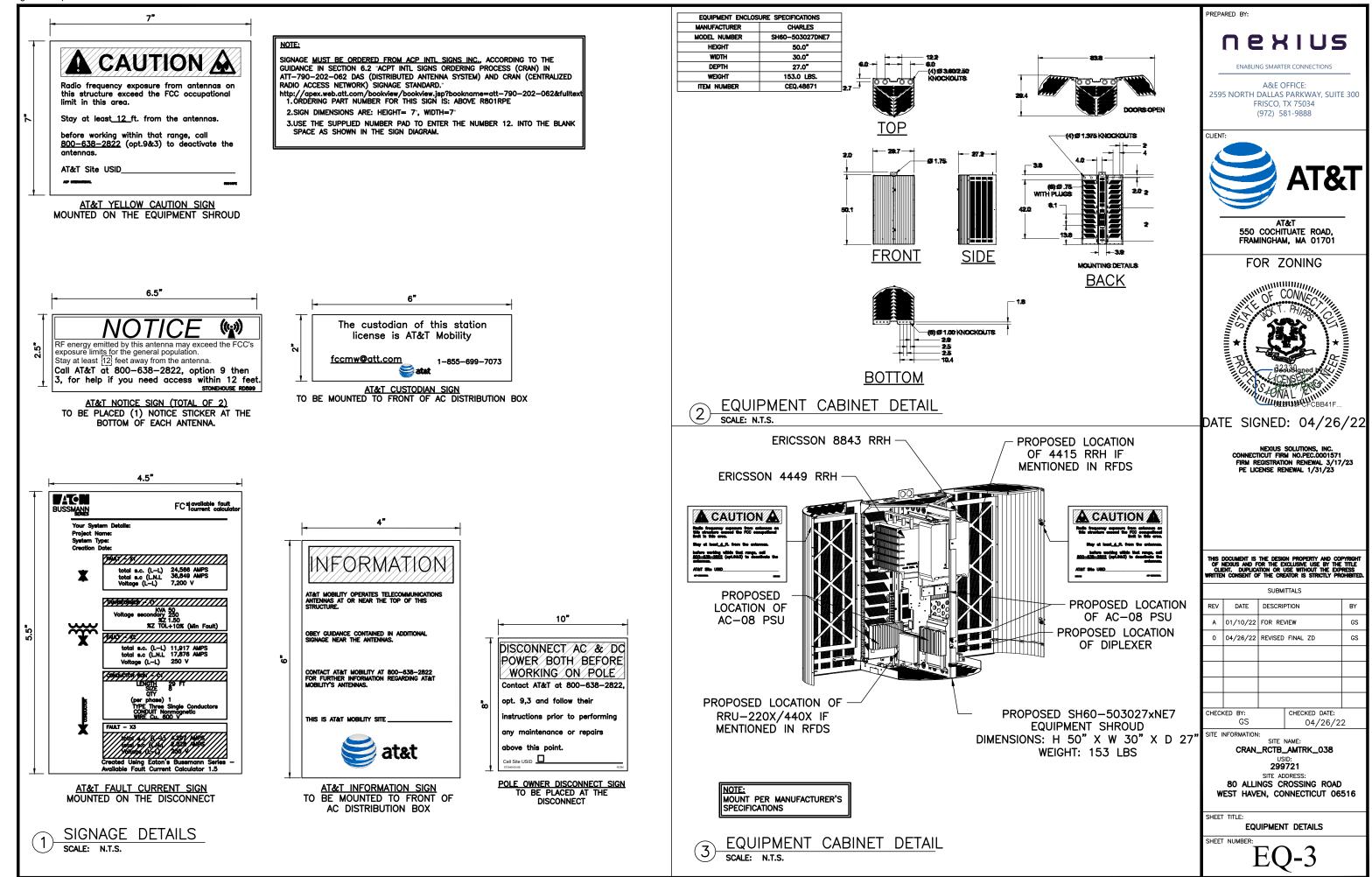
McMASTER-CARR.	Find	۵			DISTRIBUTION BU NUFACTURER DEL NUMBER HEIGHT WIDTH DEPTH	I MAIN BREAKER OX SPECIFICATIO MILBA U3741-XL- 28.0 13.0 4.84	NS NK -100-BL 0" 0"	NOTE: USE MILBAI EQUIVALENT	NK MODEL# U37 T AS REQUIRED	41-XL-100-BL O BY LOCAL UTILITY.
Remain a straight for the straight for t	utout, Red, 240VAC Each Ships i \$14.12 ADD TO ORDER Signal Type Power Source Buib Type Light Color Light Pattern For Panel Cutout Diameter For Min. Panel Depth Voltage Lens Diameter Material Bezel Material Bezel Material Ouick-Disconnect Tab Width RoHS REACH DFARS Country of Origin Related Products	n 2 weeks Each 715 Signal Light Electric LED Red Continuous 14 mm (ana") 1 sis" 240V AC erra" Plastic Metal 0.11" RoHS 3 (2015/863/EU) Compliant REACH (EC 1907/2006) (06/25/2020, 209 SVHC) Cor Specialty Metals COTS-Exempt United Kingdom 12" Wire Lead Adapter—Black 12" Wire Lead Adapter—Red tdoors and they will still be visible. Lights have	mpliant	0M 58.0°	HEIGHT WIDTH DEPTH	28.(13.(4.84			NK MODEL# U37 T AS REQUIRED	41-XL-100-BL C BY LOCAL UTILITY.

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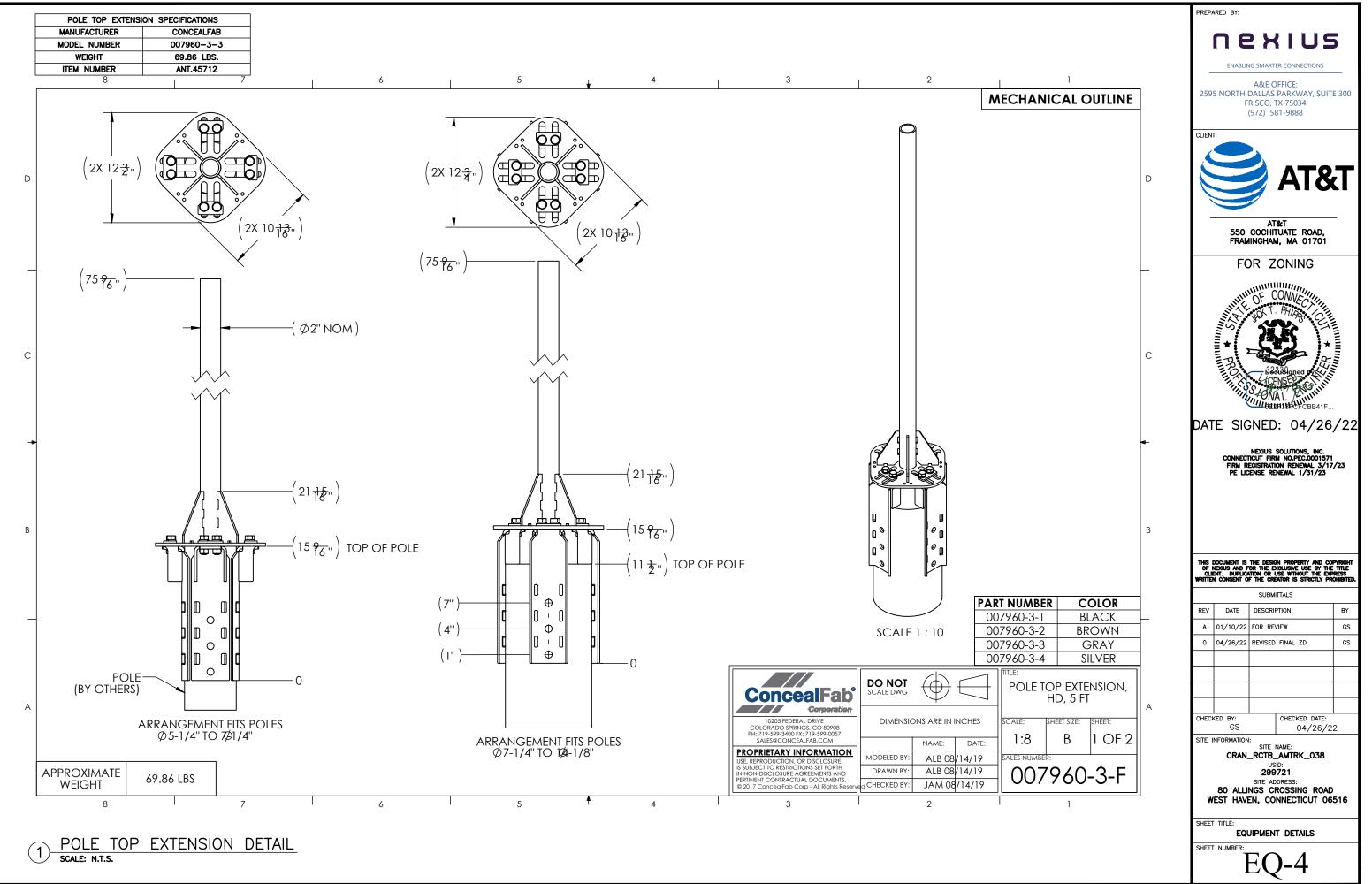


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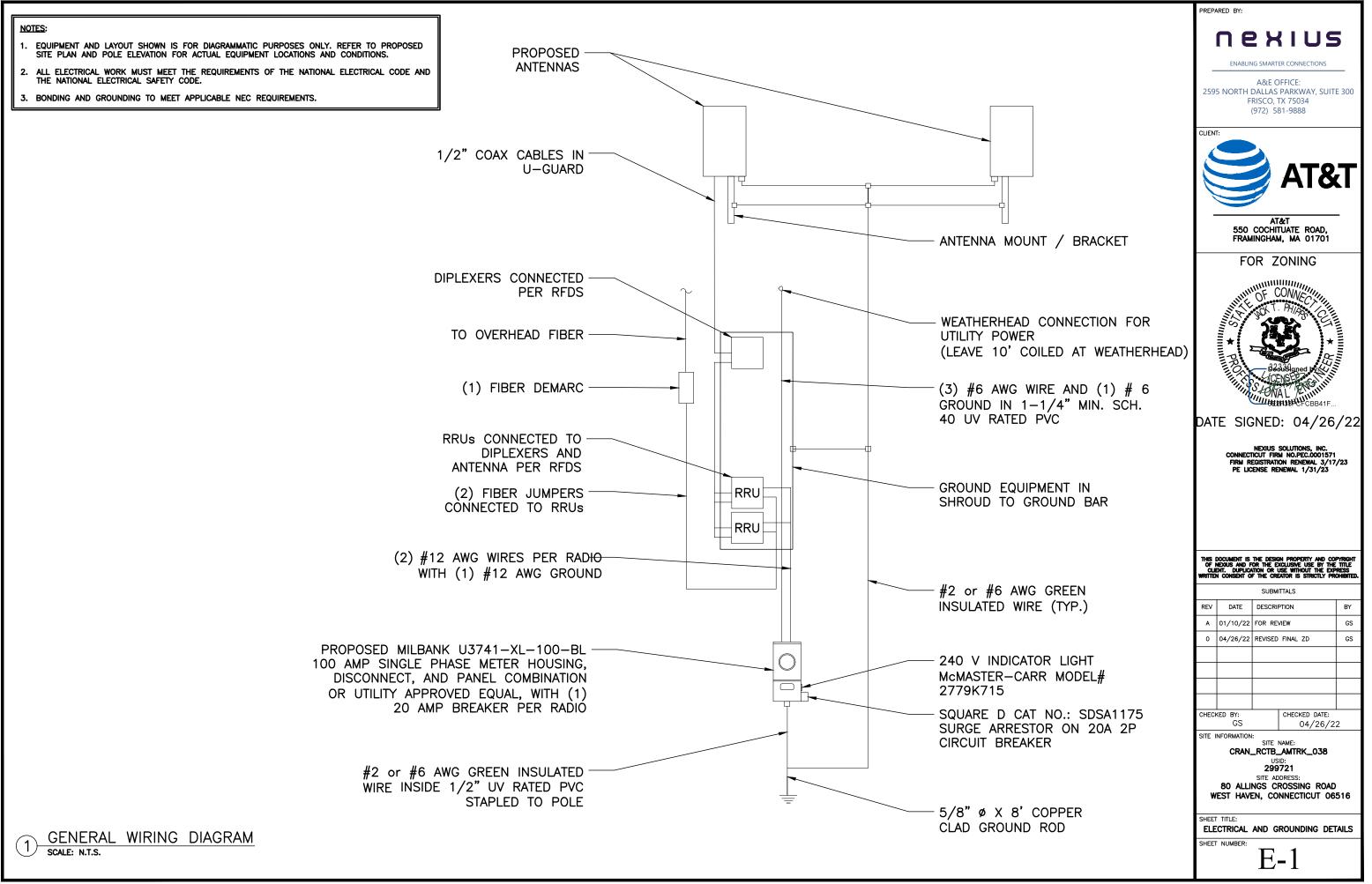
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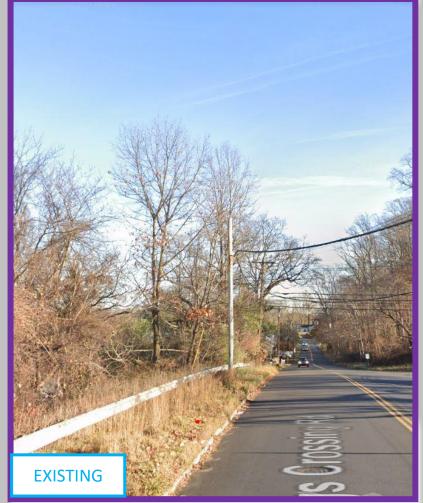


ATTACHMENT 2



CRAN_RCTB_AMTRK_038 MRCTB048276 80 ALLINGS CROSSING RD, WEST HAVEN, CT 06516 Photo-simulation produced on 04/21/2022

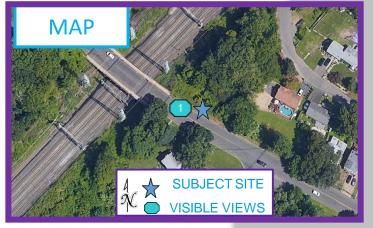








CRAN_RCTB_AMTRK_038 MRCTB048276 80 ALLINGS CROSSING RD, WEST HAVEN, CT 06516 Photo-simulation produced on 04/21/2022





ATTACHMENT 3

n e x i u s

Engineering Structural Analysis Report



CRAN_RCTB_AMTRK_038 Proposed MRCTB048276 2/28/2022 ADEQUATE

nexius

Engineering Structural Analysis Report

Reference:	Assessment of the Proposed 50	-ft Class 2 Wooden Pole.
	Cascade ID - Candidate:	CRAN_RCTB_AMTRK_038
	Site Address:	80 ALLINGS CROSSING RD, WEST HAVEN, CT 06516

We are pleased to provide you with our engineering assessment of the 50-ft Wooden Pole located at 80 ALLINGS CROSSING RD, WEST HAVEN, CT 06516.

The pole analyzed for this project is a 50-ft tall, Class 2 pole. The program calculates an applied wind load on the surface area of the attachments and multiplies that by the height of the attachment to determine a bending moment in the pole (WL load and BM). It also calculates the vertical loads applied and adds the moment due to the applied gravity loads. The calculated moment is compared to the pole capacity and capacity utilization is calculated. The final calculations for this pole indicate a capacity utilization is 71.6%. This is below the maximum allowable capacity utilization, 100%, so it is determined that the applied loads and configuration is acceptable for this pole.

Existing information such as pole height, line types, line heights and depth of set are based on site photographs gathered by Nexius staff. Line and equipment heights are determined based on standard spacing requirements set forth by the pole owner and standard industry practices. If any of these assumptions are not valid or made in error, the conclusion of this assessment may be affected and NEXIUS should review the effect on the structural integrity of the pole.

To the best of our knowledge and based on the result of this pole loading calculation, the additional loadings to the existing pole will not compromise the structural integrity of this utility/streetlight pole. This pole loading calculation satisfies the minimum requirements set forth by the National Electric Code, National Electric Safety Code, ANSI O5 utility pole standards, and the pole owner's attachment standards. If any of these assumptions are not valid or made in error, the conclusion of this assessment may be affected and NEXIUS should review the effect on the structural integrity of the pole.

Please contact us if you have any questions.

ASSUMPTIONS AND LIMITATIONS OF ANALYSIS

Please note the following assumptions and limitations inherent in this analysis and report:

A) The equipment configuration is as per "15360608.ZDCD999.220110.REV A" Drawings by NEXIUS, dated 01/10/2022.

If any of these assumptions are not valid or made in error, the conclusion of this assessment may be affected and NEXIUS should review the effect on the structural integrity of the pole.

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Propose	ed Final Equipment	
Item	Model	Quantity
Antenna	Galtronics GP2406-06670 W/ Mount Bracket	2
100 Amp Meter Socket + AC Distribution Box	MILBANK U3741-XL-100-BL	1
Equipment Cabinet	Charles SH60-503027DNE7	1
Diplexer	CommScope SDX1926Q-43	1*
Radio	Ericsson 8843	1*
Radio	Ericsson 4449	1*
PSU	Ericsson PSU AC08	3*

*Located inside Shroud

CONCLUSIONS & RECOMMENDATIONS:

The proposed 50-ft wooden pole has been found **ADEQUATE** to support its overall and total load subject to the attached Standard Conditions on **page 4** and the above-mentioned assumptions and limitations.

Please note that the soils report for the foundation were not available to us at the time of this analysis, therefore, the soil conditions have been assumed.

Should you have any questions, comments or require additional information, please do not hesitate to call.

Sincerely,

Analysis by: Salman Al Jurdi

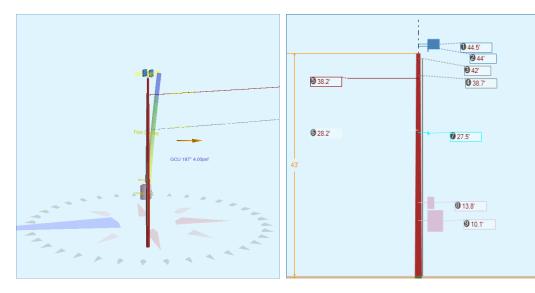
Reviewed by: Jordan Phillips, PE

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Standard Conditions for Providing Structural Consulting Services on Existing Structures

- 1. If the existing conditions are not as represented in this structural report or attached sketches, we should be contacted to evaluate the significance of the deviation and revise the structural assessment accordingly.
- 2. The structural analysis has been performed assuming that the structure is in "like new" condition. No allowance was made for excessive corrosion, damaged or missing structural members, loose bolts, etc. If there are any known deficiencies in the structure that potentially compromise structural integrity, we should be made aware of the deficiencies. If we are aware of a deficiency that exists in a structure at the time of our analysis, a general explanation of the structural concern due to the deficiency will be included in the structural report, but the deficiency will not be reflected in capacity calculations.
- 3. The structural analysis provided is an assessment of the primary load carrying capacity of the structure. We provide a limited scope of service, in that we have not verified the capacity of every weld, plate, connection detail, etc. In most cases, structural fabrication details are unknown at the time of our analysis, and the detailed field measurement of this information is beyond the scope of our services. In instances where we have not performed connection/component capacity calculations, it is assumed that existing manufactured connection/component develop the full capacity of the primary members being calculated.
- 4. We will not accept any liability for the adequacy of the existing foundation system unless accurate structural foundation drawings are provided with a site-specific geotechnical report. Foundations will be assumed installed per the drawings with no construction deficiency due to initial installation or age.
- 5. Miscellaneous items such as antenna mounts, coax supports, etc. have not been designed, detailed, or specified as part of our work. It is assumed that material of adequate size and strength will be purchased from a reputable component manufacturer. The attached report and sketches are schematic in nature and should not be used to fabricate or purchase hardware and accessories to be attached to the structure. We recommend field measurement of the structure before fabricating or purchasing new hardware and accessories. We are not responsible for proper fit and clearance of hardware and accessory items in the field.
- 6. The structural analysis has been performed considering minimum code requirements or recommendations. If alternate wind, ice, or deflection criteria are to be considered, then we shall be made aware of the alternate criteria.

Pole Num:	N/A	Pole Length /	Class:	50 / 2	Code:	NESC	Structure Type:		Deadend
Customer:	AT&T	Species:	SOL	ITHERN PINE	NESC Rule:	Rule 250B	Status		Unguyed
PACE #:	MRCTB048276	Setting Depth	(ft):	7.00	Construction Grade:	В	Pole Strength Factor	r:	0.65
USID:	299721	G/L Circumfere	ence (in):	41.61	Loading District:	Heavy	Transverse Wind LF	:	2.50
FA #:	15360608	G/L Fiber Stre	ss (psi):	8,000	Ice Thickness (in):	0.50	Wire Tension LF:		1.65
Pole Owner:	United Illum. & Frontier		ess (psi):	5,200	Wind Speed (mph):	39.53	Vertical LF:		1.50
Proposed RAD Center (AGL):	44'-6"	Fiber Stress H	It. Reduc:	No	Wind Pressure (psf):	4.00			
Latitude:		41.265445	<mark>5 Deg</mark> Longi	tude:		-72.973617 Deg	Elevation:		50 Feet



Pole Capacity Utili	zation (%)	Height (ft)	Wind Angle (deg)
Maximum	71.6	0.0	187.0
Groundline	71.6	0.0	187.0
Vertical	6.8	20.4	187.0

Pole Moments (ft-I	b)	Load Angle (deg)	Wind Angle (deg)
Max Cap Util	70,324	171.2	187.0
Groundline	70,324	171.2	187.0
GL Allowable	98,873		

Groundline Load Summar	y - Reporting /	Angle Mode: L	oad - Reportii	ng Angle: 171	.2°					
	Shear Load* (Ibs)	Applied Load (%)	Bending Moment (ft-lb)	Applied Moment (%)	Pole Capacity (%)	Bending Stress (+/- psi)	Vertical Load (Ibs)	Vertical Stress (psi)	Total Stress (psi)	Pole Capacity (%)
Powers	818	34.5	31,401	44.7	31.8	1,643	27	0	1,643	31.6
Comms	819	34.5	23,163	32.9	23.4	1,212	49	0	1,212	23.3
GenericEquipments	99	4.2	4,409	6.3	4.5	231	202	1	232	4.5
PowerEquipments	199	8.4	1,622	2.3	1.6	85	567	4	89	1.7
Pole	366	15.4	7,812	11.1	7.9	409	2,422	18	426	8.2
Risers	70	2.9	1,907	2.7	1.9	100	121	1	101	1.9
Insulators	0	0.0	9	0.0	0.0	1	9	0	1	0.0
Pole Load	2,372	100.0	70,324	100.0	71.1	3,679	3,396	25	3,704	71.2
Pole Reserve Capacity			28,549		28.9	1,521			1,496	28.8

Load Summary by Owner	_oad Summary by Owner - Reporting Angle Mode: Load - Reporting Angle: 171.2°														
	Shear Load* (Ibs)	Applied Load (%)	Bending Moment (ft-lb)	Applied Moment (%)	Pole Capacity (%)	Bending Stress (+/- psi)	Vertical Load (Ibs)	Vertical Stress (psi)	Total Stress (psi)	Pole Capacity (%)					
<undefined></undefined>	2,006	84.6	62,512	88.9	63.2	3,271	975	7	3,278	63.0					
United Illum. & Frontier	366	15.4	7,812	11.1	7.9	409	2,422	18	426	8.2					
Totals:	2,372	100.0	70,324	100.0	71.1	3,679	3,396	25	3,704	71.2					

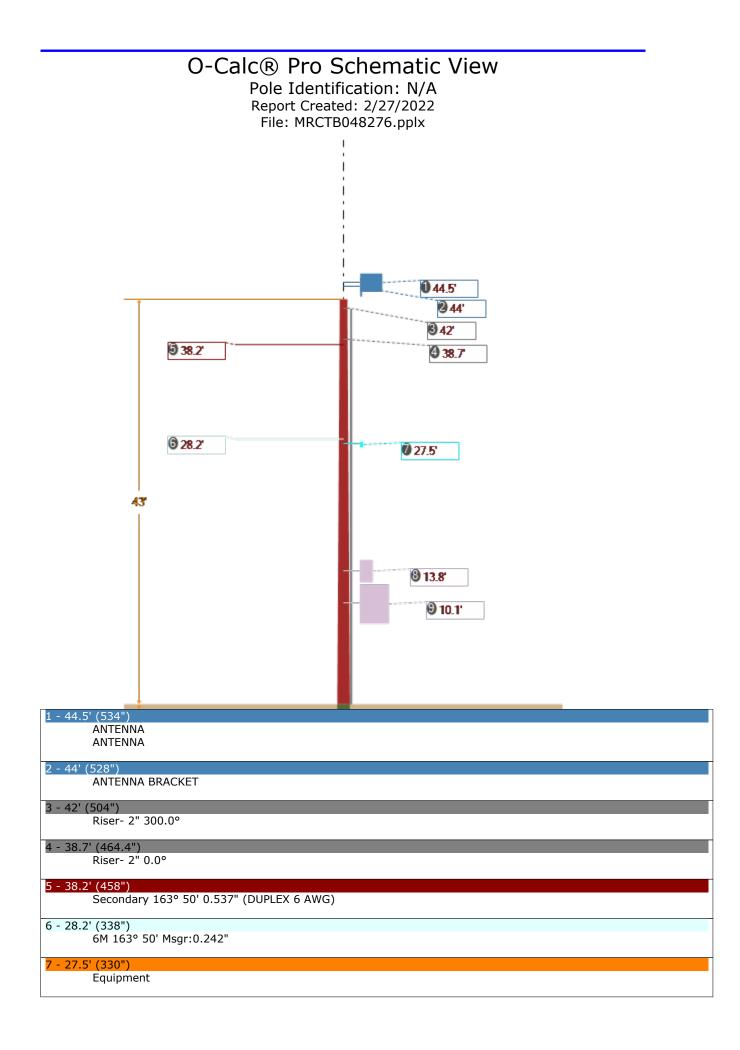
Detailed Load Components:

Power		Owner	Height (ft)	Horiz. Offset (in)	Cable Diameter (in)	Sag at Max Temp (ft)	Cable Weight (Ibs/ft)	Lead/Span Length (ft)	Span Angle (deg)	Wire Length (ft)	Tension (Ibs)	Tension Moment* (ft-lb)	Offset Moment* (ft-lb)	Wind Moment* (ft-lb)	Moment at GL* (ft-lb)
Secondary	DUPLEX 6 AWG		38.17	6.53	0.5370	0.45	0.071	50.0	163.0	50.0	500	31,164	2	71	31,238
											Totals:	31,164	2	71	31,238

Comm		Owner	Height (ft)	Horiz. Offset (in)	Cable Diameter (in)	Sag at Max Temp (ft)	Cable Weight (Ibs/ft)	Lead/Span Length (ft)	Span Angle (deg)	Wire Length (ft)	Tension (Ibs)	Tension Moment* (ft-lb)	Offset Moment* (ft-lb)	Wind Moment* (ft-lb)	Moment at GL* (ft-lb)
Overlashed Bundle	6M		28.17	7.39	0.2420	0.03	0.104	50.0	163.0	50.0	500	23,000	-14	54	23,040
Telco	BELOPTIX AT072 - 72 FIBERS - ARMORED (0.657)		28.12	7.39	0.6570		0.190	50.0	163.0	50.0			-16	19	3
											Totals:	23,000	-30	73	23,043

O-Calc® Pro Analysis Report

GenericEqui	ipment	Owner	Height (ft)	Horiz. Offset (in)	Offset Angle (deg)	Rotate Angle (deg)	Unit Weight (Ibs)	Unit Height (in)	Unit Depth (in)	Unit Diameter (in)	Unit Length (in)	Offset Moment* (ft-lb)	Wind Moment* (ft-lb)	Moment at GL* (ft-lb)
Box	AMPHENOL ANTENNA		44.50	0 12.11	30.0	0.0	31.90	23.30	6.00		23.30	38	3 2,096	5 2,134
Box	AMPHENOL ANTENNA		44.50	0 12.11	210.0	0.0	31.90	23.30	6.00		23.30	-38	3 2,096	6 2,059
Cylinder	ANTENNA BRACKET		44.00	0.08 C	0.0	0.0	66.00	24.00		2.00		1	141	l 142
Box	Fiber Demarc		27.50	0 6.18	300.0	0.0	5.00	7.00	2.50		3.00	-2	2 54	4 52
											Totals	-2	4,388	4,386
PowerEquip	ment	Owner	Height (ft)	Horiz. Offset (in)	Offset Angle (deg)	Rotate Angle (deg)	Unit Weight (Ibs)	Unit Height (in)	Unit Depth (in)	Unit Diameter (in)	Unit Length (in)	Offset Moment* (ft-lb)	Wind Moment* (ft-lb)	Moment at GL* (ft-lb)
Box	METER SOCKET		13.8	3 12.27	300.0	300.0	40.00	28.00	4.84		13.00	-26	538	3 513
Box	EQUIPMENT CABINET		10.08	8 21.00	300.0	300.0	337.67	50.00	27.00		30.00	-515	5 1,617	7 1,101
											Totals	-541	2,155	5 <mark>1,614</mark>
Riser		Owner	Height (ft)	Horiz. Offset (in)	Offset Angle (deg)	Rotate Angle	Unit Weight (Ibs)	Unit Height	Unit Depth	Unit Diameter (in)	Unit Length (in)	Offset Moment* (ft-lb)	Wind Moment* (ft-lb)	Moment at GL* (ft-lb)
Riser- 2" 0.0°	Riser- 2"		38.70		(deg) 0.0	(deg) 0.0		(in) 464.40	(in) 2.00					
Riser- 2" 300.0°	Riser- 2"		42.00	0 6.81	300.0	300.0	42.00	504.00	2.00	2.00	504.00	-15	5 1,737	7 1,722
											Totals	-36	6 1,933	3 1,897
Insulator			Owner	Height (ft)	Horiz. Offset (in)	Offset Angle (deg)	Rotate Angle (deg)	Unit Weig (Ibs)	ht Diam	eter Le	ength N	Offset loment* (ft-lb)	Wind Moment* (ft-lb)	Moment at GL* (ft-lb)
Spool	Spool 2.5"			38.17	0.00	90.0			1.00	2.50	2.12	0	14	14
Bolt	Single Bolt			28.17	0.00	0.0	D (0.0	5.00	3.00	0.00	-5	0	-5
											Totals:	-4	14	9
Pole Bucklir	ng													
Buckling Constant	Column Section	Buckling Section Diameter (in)	Minimum Buckling Diameter a GL (in)		at Diamet GL (in	Ela	dulus of asticity (psi)	Pole Density (pcf)	Ice Density (pcf)	y Pole T Heigl (ft)	nt Lo Capa He	oad city at A	Buckling Load pplied at Height (lbs)	Buckling Load Factor of Safety
2.00	20.36 32.84	12.42	15.0)4 7	.96	13.25	1.60e+6	60.00	57.0	0 4	3.00	50,255	499.47	14.71



8 - 13.8' (166")	
Box METER SOCKET	
9 - 10.1' (121")	
Box EQUIPMENT CABINET	

ATTACHMENT 4

Radio Frequency – Electromagnetic Energy (RF-EME) Compliance Report

Site No. 15360608 MRCTB048276 CRAN_RCTB_AMTRK_038 80 Allings Crossing Road West Haven, Connecticut 06516 New Haven County 41.26544500; -72.97361700 NAD83 Utility Pole

The proposed AT&T installation will be in compliance with FCC regulations upon proper installation of recommended signage.

EBI Project No. 6222000312 February 1, 2022



Prepared for:

AT&T Mobility, LLC c/o Nexius 2999 Oak Road, Suite 110 Walnut Creek, California 94597



TABLE OF CONTENTS

EXEC	CUTIVE SUMMARY	I
1.0	FEDERAL COMMUNICATIONS COMMISSION (FCC) REQUIREMENTS	3
2.0	AT&T RF Exposure Policy Requirements	5
3.0	WORST-CASE PREDICTIVE MODELING	5
4.0	RECOMMENDED SIGNAGE/COMPLIANCE PLAN	7
5.0	SUMMARY AND CONCLUSIONS	8
6.0	LIMITATIONS	8

APPENDICES

Appendix A	Personnel Certifications
Appendix B	Compliance/Signage Plan

EXECUTIVE SUMMARY

Purpose of Report

EnviroBusiness Inc. (dba EBI Consulting) has been contracted by AT&T Mobility, LLC to conduct radio frequency electromagnetic (RF-EME) modeling for AT&T Site 15360608 located at 80 Allings Crossing Road in West Haven, Connecticut to determine RF-EME exposure levels from proposed AT&T wireless communications equipment at this site. As described in greater detail in Section 1.0 of this report, the Federal Communications Commission (FCC) has developed Maximum Permissible Exposure (MPE) Limits for general public exposures and occupational exposures. This report summarizes the results of RF-EME modeling in relation to relevant FCC RF-EME compliance standards for limiting human exposure to RF-EME fields.

This report contains the RF EME analysis for the site, including the following:

- Site Plan with antenna locations
- Graphical representation of theoretical MPE fields based on modeling
- Graphical representation of recommended signage and/or barriers

This document addresses the compliance of AT&T's transmitting facilities independently and in relation to all collocated facilities at the site.

Statement of Compliance

A site is considered out of compliance with FCC regulations if there are areas that exceed the FCC exposure limits <u>and</u> there are no RF hazard mitigation measures in place. Any carrier which has an installation that contributes more than 5% of the applicable MPE must participate in mitigating these RF hazards.

As presented in the sections below, based on worst-case predictive modeling, there are no modeled exposures on any accessible utility line level and ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

As such, the proposed AT&T installation is in compliance with FCC regulations upon proper installation of recommended signage and/or barriers.

AT&T Recommended Signage/Compliance Plan

AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, requires that:

- I. All sites must be analyzed for RF exposure compliance;
- 2. All sites must have that analysis documented; and
- 3. All sites must have any necessary signage and barriers installed.

Site compliance recommendations have been developed based upon protocols presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, additional guidance provided by AT&T, EBI's understanding of FCC and OSHA requirements, and common industry practice. Barrier locations have been identified (when required) based on guidance presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014.

The following signage is recommended at this site:

Install 7 by 7-inch CAUTION signs on the equipment cabinet on the side of the utility pole.

The signage proposed for installation at this site complies with AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document and therefore complies with FCC and OSHA requirements. Barriers are not recommended on this site. To reduce the risk of exposure and/or injury, EBI recommends that access to the utility pole or areas associated with the active antenna installation be restricted and secured where possible. More detailed information concerning site compliance recommendations is presented in Section 4.0 and Appendix B of this report.

1.0 FEDERAL COMMUNICATIONS COMMISSION (FCC) REQUIREMENTS

The FCC has established Maximum Permissible Exposure (MPE) limits for human exposure to Radiofrequency Electromagnetic (RF-EME) energy fields, based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits developed by the Institute of Electrical and Electronics Engineers, Inc. (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC guidelines incorporate two separate tiers of exposure limits that are based upon occupational/controlled exposure limits (for workers) and general public/uncontrolled exposure limits for members of the general public.

Occupational/controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/ controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general public/uncontrolled limits (see below), as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over this or her exposure by leaving the area or by some other appropriate means.

General public/uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area.

Table I and Figure I (below), which are included within the FCC's OET Bulletin 65, summarize the MPE limits for RF emissions. These limits are designed to provide a substantial margin of safety. They vary by frequency to take into account the different types of equipment that may be in operation at a particular facility and are "time-averaged" limits to reflect different durations resulting from controlled and uncontrolled exposures.

The FCC's MPEs are measured in terms of power (mW) over a unit surface area (cm²). Known as the power density, the FCC has established an occupational MPE of 5 milliwatts per square centimeter (mW/cm²) and an uncontrolled MPE of 1 mW/cm² for equipment operating in the 1900 MHz frequency range. For the AT&T equipment operating at 850 MHz, the FCC's occupational MPE is 2.83 mW/cm² and an uncontrolled MPE of 0.57 mW/cm². For the AT&T equipment operating at 700 MHz, the FCC's occupational MPE is 2.33 mW/cm² and an uncontrolled MPE of 0.47 mW/cm². These limits are considered protective of these populations.

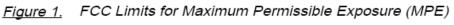
Table I: Limits for Maximum Permissible Exposure (MPE)							
(A) Limits for Occupational/Controlled Exposure							
Frequency Range (MHz)							
0.3-3.0	614	1.63	(100)*	6			
3.0-30	1842/f	4.89/f	(900/f ²)*	6			
30-300	61.4	0.163	1.0	6			
300-1,500			f/300	6			
1,500-100,000 5 6							

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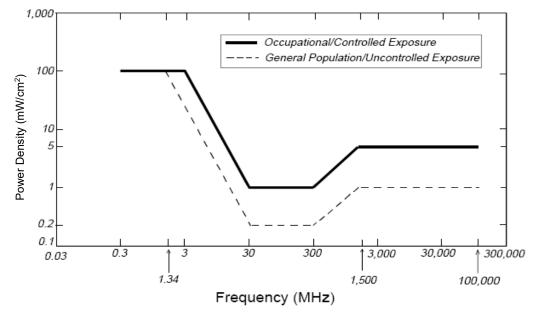
Table I: Limits for Maximum Permissible Exposure (MPE)							
(A) Limits for Occupational/Controlled Exposure							
Frequency Range (MHz)Electric Field Strength (E) (V/m)Magnetic Field Strength (H) (A/m)Power Density (S) (mW/cm²)Averaging Time [E]², [H]², or S (minutes)							
(B) Limits for General Public/Uncontrolled Exposure							
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time [E] ² , [H] ² , or S (minutes)			
0.3-1.34	614	1.63	(100)*	30			
1.34-30	824/f	2.19/f	(180/f ²)*	30			
30-300	27.5	0.073	0.2	30			
300-1,500			f/1,500	30			
1,500-100,000			1.0	30			

f = Frequency in (MHz)

* Plane-wave equivalent power density



Plane-wave Equivalent Power Density



Based on the above, the most restrictive thresholds for exposures of unlimited duration to RF energy for several personal wireless services are summarized below:

Personal Wireless Service	Approximate Frequency	Occupational MPE	Public MPE
Microwave (Point-to-Point)	5,000 - 80,000 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Broadband Radio (BRS)	2,600 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Wireless Communication (WCS)	2,300 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Advanced Wireless (AWS)	2,100 MHz	5.00 mW/cm ²	1.00 mW/cm ²
Personal Communication (PCS)	1,950 MHz	5.00 mW/cm ²	I.00 mW/cm ²
Cellular Telephone	870 MHz	2.90 mW/cm ²	0.58 mW/cm ²
Specialized Mobile Radio (SMR)	855 MHz	2.85 mW/cm ²	0.57 mW/cm ²

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Personal Wireless Service	Approximate Occupational Frequency MPE		Public MPE	
Long Term Evolution (LTE)	700 MHz	2.33 mW/cm ²	0.47 mW/cm ²	
Most Restrictive Frequency Range	30-300 MHz	1.00 mW/cm ²	0.20 mW/cm ²	

MPE limits are designed to provide a substantial margin of safety. These limits apply for continuous exposures and are intended to provide a prudent margin of safety for all persons, regardless of age, gender, size, or health.

Personal Communication (PCS) facilities used by AT&T in this area operate within a frequency range of 700-1900 MHz. Facilities typically consist of: 1) electronic transceivers (the radios or cabinets) connected to wired telephone lines; and 2) antennas that send the wireless signals created by the transceivers to be received by individual subscriber units (PCS telephones). Transceivers are typically connected to antennas by coaxial cables.

Because of the short wavelength of PCS services, the antennas require line-of-site paths for good propagation, and are typically installed above ground level. Antennas are constructed to concentrate energy towards the horizon, with as little energy as possible scattered towards the ground or the sky. This design, combined with the low power of PCS facilities, generally results in no possibility for exposure to approach Maximum Permissible Exposure (MPE) levels, with the exception of areas directly in front of the antennas.

2.0 AT&T RF EXPOSURE POLICY REQUIREMENTS

AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, requires that:

- I. All sites must be analyzed for RF exposure compliance;
- 2. All sites must have that analysis documented; and
- 3. All sites must have any necessary signage and barriers installed.

Pursuant to this guidance, worst-case predictive modeling was performed for the site. This modeling is described below in Section 3.0. Lastly, based on the modeling and survey data, EBI has produced a Compliance Plan for this site that outlines the recommended signage and barriers. The recommended Compliance Plan for this site is described in Section 4.0.

3.0 WORST-CASE PREDICTIVE MODELING

In accordance with AT&T's RF Exposure policy, EBI performed theoretical modeling using RoofMaster™ software to estimate the worst-case power density at the site utility line level and ground-level and/or nearby rooftops resulting from operation of the antennas. RoofMaster[™] is a widely-used predictive modeling program that has been developed to predict RF power density values for rooftop and tower telecommunications sites produced by vertical collinear antennas that are typically used in the cellular, PCS, paging and other communications services. Using the computational methods set forth in Federal Communications (FCC) Office of Engineering & Technology (OET) Bulletin 65, "Evaluating Compliance with FCC Guidelines for Human Exposure to Radiofrequency Electromagnetic Fields" (OET-65), RoofMaster[™] calculates predicted power density in a scalable grid based on the contributions of all RF sources characterized in the study scenario. At each grid location, the cumulative power density is expressed as a percentage of the FCC limits. Manufacturer antenna pattern data is utilized in these calculations. RoofMaster[™] models consist of the Far Field model as specified in OET-65 and an implementation of the OET-65 Cylindrical Model (Sula9). The models utilize several operational specifications for different types of antennas to produce a plot of spatially-averaged power densities that can be expressed as a percentage of the applicable exposure limit. A statistical power factor may be applied to the antenna system based on guidance from the carrier and system manufacturers.

For this report, EBI utilized antenna and power data provided by AT&T and compared the resultant worstcase MPE levels to the FCC's occupational/controlled exposure limits outlined in OET Bulletin 65.

The assumptions used in the modeling are based upon information provided by AT&T and information gathered from other sources. There are no other wireless carriers with equipment installed at this site.

Based on worst-case predictive modeling, there are no modeled exposures on any accessible utility line level and ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

Modeling indicates that the worst-case emitted power density may exceed the FCC's general public limit within approximately 29 feet of the antenna face and the occupational limit within approximately 12 feet of the antenna face. Modeling also indicates that the worst-case emitted power density may exceed the FCC's general population limit within approximately 7 feet below the bottom of the AT&T antenna and the occupational limit within approximately 5 feet below the bottom of the AT&T antenna.

At the nearest walking/working surfaces to the AT&T antennas on the utility line level, the maximum power density generated by the AT&T antennas is approximately 84.76 percent of the FCC's general public limit (16.95 percent of the FCC's occupational limit). The composite exposure level from all carriers on this site is approximately 84.76 percent of the FCC's general public limit (16.95 percent of the FCC's occupational limit) at the nearest walking/working surface to each antenna. It should be noted that percentage of MPE is based on spatially-averaged power densities over a height of six feet, with the height of the utility line being centered within that spatial range. Based on worst-case predictive modeling, there are no areas at ground/street level related to the proposed AT&T antennas that exceed the FCC's occupational or general public exposure limits at this site. At ground/street level, the maximum power density generated by the antennas is approximately 1.41 percent of the FCC's general public limit (0.282 percent of the FCC's occupational limit).

A graphical representation of the RoofMaster[™] modeling results is presented in Appendix B.

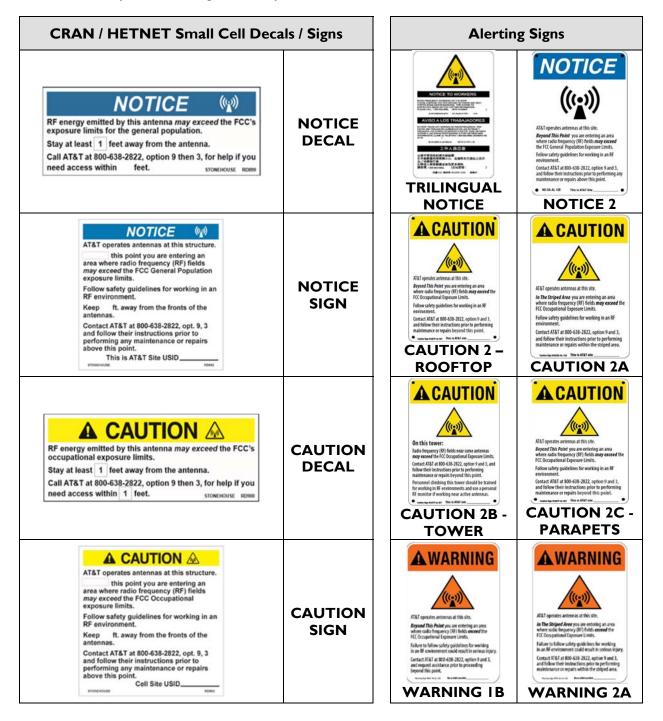
Microwave dish antennas are designed for point-to-point operations at the elevations of the installed equipment rather than ground-level coverage. Based on AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, microwave antennas are considered compliant if they are higher than 20 feet above any accessible walking/working surface. There are no microwaves installed at this site.

4.0 RECOMMENDED SIGNAGE/COMPLIANCE PLAN

Signs are the primary means for control of access to areas where RF exposure levels may potentially exceed the MPE. As presented in the AT&T guidance document, the signs must:

- Be posted at a conspicuous point;
- Be posted at the appropriate locations;
- Be readily visible; and
- Make the reader aware of the potential risks prior to entering the affected area.

The table below presents the signs that may be used for AT&T installations.



Based upon protocols presented in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document, dated October 28, 2014, and additional guidance provided by AT&T, the following signage is recommended on the site:

Install 7 by 7-inch CAUTION signs on the equipment cabinet on the side of the utility pole.

No barriers are required for this site. Barriers should be constructed of weather-resistant plastic or wood fencing. Barriers may consist of railing, rope, chain, or weather-resistant plastic if no other types are permitted or are feasible. Painted stripes should only be used as a last resort and only in regions where there is little chance of snowfall. If painted stripes are selected as barriers, it is recommended that the stripes and signage be illuminated. The signage and any barriers are graphically represented in the Signage Plan presented in Appendix B.

5.0 SUMMARY AND CONCLUSIONS

EBI has prepared this Radiofrequency Emissions Compliance Report for the proposed AT&T telecommunications equipment at the site located at 80 Allings Crossing Road in West Haven, Connecticut.

EBI has conducted theoretical modeling to estimate the worst-case power density from AT&T antennas to document potential MPE levels at this location and ensure that site control measures are adequate to meet FCC and OSHA requirements, as well as AT&T's corporate RF safety policies. As presented in the preceding sections, based on worst-case predictive modeling, there are no modeled exposures on any accessible utility line level and ground walking/working surface related to ATT's proposed antennas that exceed the FCC's occupational and/or general public exposure limits at this site.

To reduce the risk of exposure and/or injury, EBI recommends that access to the utility pole or areas associated with the active antenna installation be restricted and secured where possible. Signage is recommended at the site as presented in Section 4.0 and Appendix B. Posting of the signage brings the site into compliance with FCC rules and regulations and AT&T's corporate RF safety policies.

6.0 LIMITATIONS

This report was prepared for the use of AT&T Mobility, LLC to meet requirements outlined in AT&T's corporate RF safety guidelines. It was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same locale under like circumstances. The conclusions provided by EBI and its partners are based solely on information supplied by AT&T. The observations in this report are valid on the date of the investigation. Any additional information that becomes available concerning the site should be provided to EBI so that our conclusions may be revised and modified, if necessary. This report has been prepared in accordance with Standard Conditions for Engagement and authorized proposal, both of which are integral parts of this report. No other warranty, expressed or implied, is made.

Appendix A

Personnel Certifications

Preparer Certification

I, Rebecca Sinisgalli, state that:

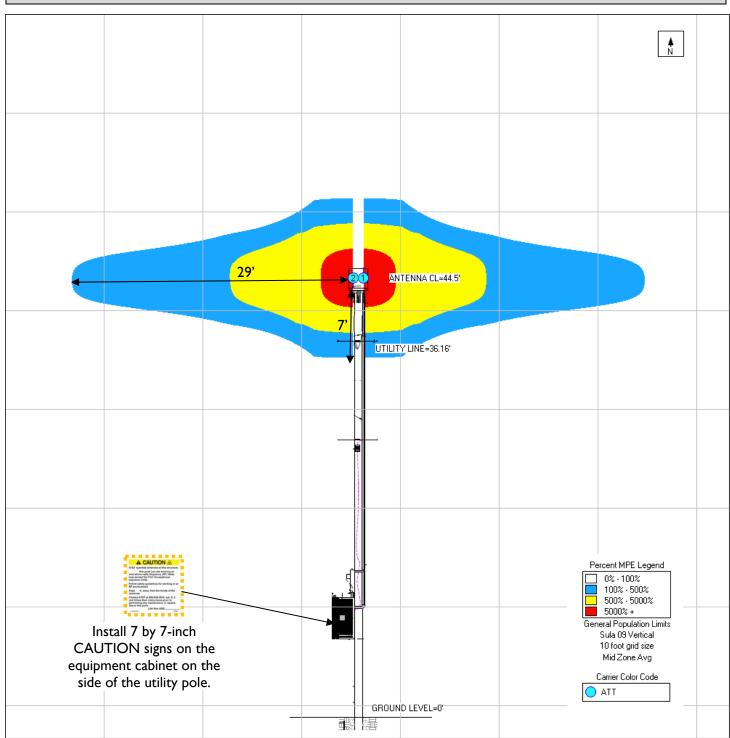
- I am an employee of EnviroBusiness Inc. (d/b/a EBI Consulting), which provides RF-EME safety and compliance services to the wireless communications industry.
- I have successfully completed RF-EME safety training, and I am aware of the potential hazards from RF-EME and would be classified "occupational" under the FCC regulations.
- I am fully aware of and familiar with the Rules and Regulations of both the Federal Communications Commissions (FCC) and the Occupational Safety and Health Administration (OSHA) with regard to Human Exposure to Radio Frequency Radiation.
- I have been trained in on the procedures outlined in AT&T's RF Exposure: Responsibilities, Procedures & Guidelines document (dated October 28, 2014) and on RF-EME modeling using RoofMaster[™] modeling software.
- I have reviewed the data provided by the client and incorporated it into this Site Compliance Report such that the information contained in this report is true and accurate to the best of my knowledge.

Rebecco Diaglie

Appendix B

Compliance/Signage Plan

Elevation Simulation



		SIGN IDENTIFICATION LEGEND			
Existing Sign		AT&T NOTICE 2 Sign	A CAUTION	AT&T CAUTION 2 - Rooftop Sign	
		AT&T WARNING IB and 2A Signs		AT&T CAUTION 2B – Tower Sign	
Proposed Sign		AT&T NOTICE Small Cell Signs	A CAUTION A CAUTION RESERVICE RESERVICE RESERVICE	AT&T CAUTION 2C – Parapet Sign	
Installed Sign	A CANTON DA A CANTON DA Table State Park Market	AT&T CAUTION Small Cell Signs		AT&T TRILINGUAL NOTICE Sign	

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ATTACHMENT 5

CERTIFICATION OF SERVICE

I hereby certify that on May 10, 2022 a copy of the following notice of the intended filing of a Petition with the Connecticut Siting Council for a declaratory ruling was sent by certified mail, return receipt requested, to the list below:

Dated: <u>May 10, 2022</u>

Lucie Chrocchio

Cuddy & Feder LLP 45 Hamilton Avenue, 14th Floor White Plains, New York 10601 Attorneys for: New Cingular Wireless PCS, LLC (AT&T)

State			
THE HONORABLE WILLIAM TONG	DEPARTMENT OF ECONOMIC AND		
ATTORNEY GENERAL	COMMUNITY DEVELOPMENT		
OFFICE OF THE ATTORNEY GENERAL	DAVID LEHMAN, COMMISSIONER		
165 CAPITOL AVENUE	450 COLUMBUS BLVD		
HARTFORD, CT 06106	HARTFORD, CT 06103		
DEPARTMENT OF PUBLIC HEALTH	PUBLIC UTILITIES REGULATORY		
DR. MANISHA JUTHANI, MD,	AUTHORITY		
ACTING COMMISSIONER	MARISSA P. GILLETT, CHAIRMAN		
410 CAPITOL AVENUE	10 FRANKLIN SQUARE		
HARTFORD, CT 06134	NEW BRITAIN, CT 06051		
COUNCIL ON ENVIRONMENTAL QUALITY	DEPARTMENT OF TRANSPORTATION		
PETER B. HEARN, EXECUTIVE DIRECTOR	JOSEPH GIULIETTI, COMMISSIONER		
79 ELM STREET, 6 th FLOOR	2800 BERLIN TURNPIKE, P.O. BOX 317546		
HARTFORD, CT 06106	NEWINGTON, CT 06131		
DEPARTMENT OF ENERGY &	DEPARTMENT OF AGRICULTURE		
ENVIRONMENTAL PROTECTION	BRYAN P. HURLBURT, COMMISSIONER		
KATIE DYKES, COMMISSIONER	450 COLUMBUS BOULEVARD		
79 ELM STREET SUITE 701			
HARTFORD, CT 06106	HARTFORD, CT 06103		
OFFICE OF POLICY AND MANAGEMENT	SECRETARY OF THE STATE		
JEFFREY R. BECKHAM, SECRETARY	DENISE W. MERRILL		
450 CAPITOL AVENUE	165 CAPITOL AVENUE, SUITE 1000		
HARTFORD, CT 06106	P.O. BOX 150470		
,,, _,, _	HARTFORD, CT 06106		
	- ,		
SOUTH CENTRAL REGIONAL COUNCIL OF	DEPARTMENT OF EMERGENCY SERVICES		
GOVERNMENTS	& PUBLIC PROTECTION		
127 WASHINGTON AVE., 4 TH FLOOR WEST	DIVISION OF EMERGENCY		
NORTH HAVEN, CT 06473	MANAGEMENT AND HOMELAND		
	SECURITY		
	JAMES C. ROVELLA, COMMISSIONER		

STATE HISTORIC PRESERVATION OFFICE DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT 450 COLUMBUS BLVD., 5 TH FLOOR HARTFORD, CT 06103	1111 COUNTRY CLUB ROAD MIDDLETOWN, CT 06457 STATE REPRESENTATIVE- 115 TH DISTRICT DORINDA BORER LEGISLATIVE OFFICE BUILDING 300 CAPITOL AVENUE ROOM 4041 HARTFORD, CT 06106
STATE SENATOR – DISTRICT S14 JAMES MARONEY LEGISLATIVE OFFICE BUILDING 300 CAPITOL AVENUE ROOM 3300 HARTFORD, CT 06106	

Federal				
FEDERAL COMMUNICATIONS	FEDERAL AVIATION ADMINISTRATION			
COMMISSION	800 INDEPENDENCE AVENUE, SW			
45 L STREET NE	WASHINGTON, DC 20591			
WASHINGTON, DC 20554				
U.S. SENATOR CHRIS MURPHY	U.S. SENATOR RICHARD BLUMENTHAL			
COLT GATEWAY	90 STATE HOUSE SQUARE, 10TH FLOOR			
120 HUYSHOPE AVENUE	HARTFORD, CT 06103			
SUITE 401				
HARTFORD, CT 06106				
U.S. CONGRESSWOMAN – 3 RD DISTRICT				
ROSA DELAURO				
59 ELM STREET				
NEW HAVEN, CT 06510				

City of West Haven

NANCY R. ROSSI, MAYOR	CHRISTOPHER SOTO			
MAYOR'S OFFICE	PLANNING DIRECTOR			
WEST HAVEN CITY HALL	WEST HAVEN CITY HALL			
355 MAIN STREET	355 MAIN STREET			
3 RD FLOOR	1 ST FLOOR			
WEST HAVEN, CT 06516	WEST HAVEN, CT 06516			
INLAND/WETLANDS WATERCOURSE	PATRICIA C. HORVATH			
AGENCY	CITY CLERK			
WEST HAVEN CITY HALL	WEST HAVEN CITY HALL			
355 MAIN STREET	355 MAIN STREET			
WEST HAVEN, CT 06516	1 ST FLOOR			
	WEST HAVEN, CT 06516			

PLANNING AND ZONING COMMISSION WEST HAVEN CITY HALL 355 MAIN STREET WEST HAVEN, CT 06516	

NOTICE

Notice is hereby given, pursuant to Section 16-50j-40(a) of the Regulations of Connecticut State Agencies of a Petition being filed with the Connecticut Siting Council ("Siting Council") on or after May 12, 2022 by New Cingular Wireless PCS, LLC ("AT&T"). AT&T seeks a declaratory ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required under Section 16-50k(a) of the Connecticut General Statutes ("C.G.S.") to install a new "small cell" wireless telecommunications facility on a new pole within the public right-of-way.

The proposed telecommunications facility will be in the public right-of-way located adjacent to 80 Allings Crossing Road, West Haven, Connecticut. AT&T proposes the installation of an approximately 50'-tall Class 2 utility pole. The proposed pole will stand approximately 43'o"-tall above grade level ("AGL"). AT&T proposes to install two panel antennas to the top of the new utility pole at a centerline height of approximately 44'6"AGL with a total height of 45'6" AGL to the top of the antennas and mount. A new equipment cabinet is proposed lower on the pole.

The Petition will provide additional details of the proposal and explain why AT&T submits that this proposed small cell facility presents no significant adverse environmental effects. The location, height, and other features of the proposal are subject to review and potential change under the provisions of Connecticut General Statutes Sections 16-50g *et. seq*.

Copies of the Petition will be on file with the following on or after May 12, 2022:

Connecticut Siting Council	City Clerk
10 Franklin Square	355 Main Street, 1st Floor
New Britain, Connecticut 06051	West Haven, CT 06516

or the offices of the undersigned. A copy of the Petition will also be available on the Connecticut Siting Council website: <u>https://www.ct.gov/cSc/site/default.asp</u> under Pending Matters. All inquiries should be addressed to the Connecticut Siting Council or to the undersigned.

Lucia Chiocchio, Esq. Daniel Patrick, Esq. Cuddy & Feder LLP 445 Hamilton Ave, 14th Floor White Plains, New York 10601 (914) 761-1300 Attorneys for the Petitioner

CERTIFICATION OF SERVICE

I hereby certify that on May 10, 2022 a copy of this Petition and the following letter and notice of the intended filing of a Petition with the Connecticut Siting Council for a declaratory ruling was sent by certified mail, return receipt requested, to the attached list of abutting property owners:

Dated: May 10, 2022

Lucie Chrocchio

Cuddy & Feder LLP 45 Hamilton Avenue, 14th Floor White Plains, New York 10601 Attorneys for: New Cingular Wireless PCS, LLC (AT&T)

S C C Regional Water	S C C Regional Water
95 Allings Crossing	90 Sargent Drive
West Haven, CT 06516	New Haven, CT 06511
State of Connecticut	State of Connecticut
Allings Crossing	80 Washington Street
West Haven, CT 06516	Hartford, CT 06606
Nicholas Rapetski Jr. &	Nicholas Rapetski Jr. &
Carmen R AS JT Perretta	Carmen R AS JT Perretta
80 Allings Crossing	15 Tumblebrook Road
West Haven, CT 06516	Milford, CT 06461
Nicholas Rapetski Jr. &	
Carmen R AS JT Perretta	
600 Island Lane	
West Haven, CT 06516	

May 10, 2022

<u>VIA CERTIFIED MAIL/</u> <u>RETURN RECEIPT REQUESTED</u>

Re: New Cingular Wireless PCS, LLC ("AT&T") Installation of A Small Cell Wireless Telecommunication Facility <u>80 Allings Crossing Road, West Haven, Connecticut</u>

Dear Sir or Madam:

We are writing to you on behalf of our client New Cingular Wireless PCS, LLC ("AT&T") with respect to the above referenced matter and our client's intent to file a petition for a declaratory ruling with the State of Connecticut Siting Council for approval of installation of a small cell wireless telecommunication facility on a new pole (the "Facility") to be installed in the public right-of-way near the above-captioned property.

State law requires that record owners of property abutting a parcel on which a facility is proposed be sent notice of an applicant's intent to file a petition with the Siting Council.

Included with this letter please find a Notice of this submission and details of the proposal. The location, height and other features of the Facility are subject to review and potential change by the Connecticut Siting Council under the provisions of Connecticut General Statutes §16-50g *et seq*.

If you have any questions concerning this petition, please contact the Connecticut Siting Council or the undersigned after May 12, 2022 which is the date that the petition is expected to be on file.

Very truly yours,

Lucia Chiocchio Enclosure

cc: Daniel Patrick, Esq., Cuddy & Feder LLP

NOTICE

Notice is hereby given, pursuant to Section 16-50j-40(a) of the Regulations of Connecticut State Agencies of a Petition being filed with the Connecticut Siting Council ("Siting Council") on or after May 12, 2022 by New Cingular Wireless PCS, LLC ("AT&T"). AT&T seeks a declaratory ruling that no Certificate of Environmental Compatibility and Public Need ("Certificate") is required under Section 16-50k(a) of the Connecticut General Statutes ("C.G.S.") to install a new "small cell" wireless telecommunications facility on a new pole within the public right-of-way.

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The Petition will provide additional details of the proposal and explain why AT&T submits that this proposed small cell facility presents no significant adverse environmental effects. The location, height, and other features of the proposal are subject to review and potential change under the provisions of Connecticut General Statutes Sections 16-50g *et. seq*.

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10 Franklin Square	355 Main Street, 1st Floor
New Britain, Connecticut 06051	West Haven, CT 06516

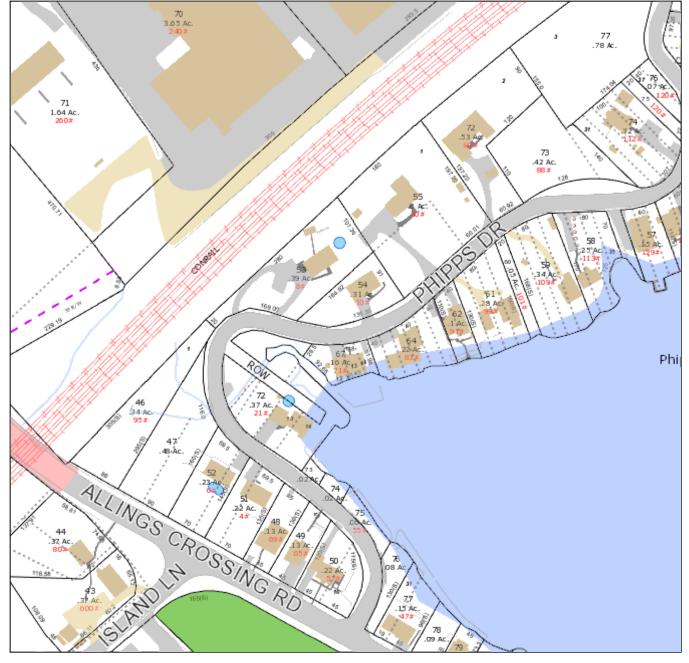
or the offices of the undersigned. A copy of the Petition will also be available on the Connecticut Siting Council website: <u>https://www.ct.gov/cSc/site/default.asp</u> under Pending Matters. All inquiries should be addressed to the Connecticut Siting Council or to the undersigned.

Lucia Chiocchio, Esq. Daniel Patrick, Esq. Cuddy & Feder LLP 445 Hamilton Ave, 14th Floor White Plains, New York 10601 (914) 761-1300 Attorneys for the Petitioner

City of West Haven Geographic Information System (GIS)



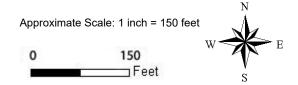
Date Printed: 5/3/2022



Print Map

MAP DISCLAIMER - NOTICE OF LIABILITY

This map is for assessment purposes only. It is not for legal description or conveyances. All information is subject to verification by any user. The City of West Haven and its mapping contractors assume no legal responsibility for the information contained herein.



ABUTTERS LIST

Parcel ID	Site Address	Owner Name	Mailing Address	City	State	Zip
025-0046-	95 Allings Crossing,	S C C Regional Water	90 Sargent Drive	New Haven	СТ	06511
0-0000	West Haven					
025-0047-	Allings Crossing,	State of Connecticut	80 Washington Street	Hartford	СТ	06606
0-0000	West Haven					
025-0044-	80 Allings Crossing,	Rapetski Nicholas Jr & Perretta	15 Tumblebrook Road	Milford	СТ	06461
0-0000	West Haven	Carmen R As JT				
025-0043-	600 Island Lane,	Rapetski Nicholas Jr & Perretta	15 Tumblebrook Road	Milford	СТ	06461
0-0000	West Haven	Carmen R As JT				