



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

Phone: (860) 827-2935 Fax: (860) 827-2950

E-Mail: [siting.council@ct.gov](mailto:siting.council@ct.gov)

Web Site: [portal.ct.gov/csc](http://portal.ct.gov/csc)

VIA ELECTRONIC MAIL

July 11, 2022

Kenneth C. Baldwin, Esq.  
Robinson and Cole LLP  
280 Trumbull Street  
Hartford, CT 06103-3597  
[kbaldwin@rc.com](mailto:kbaldwin@rc.com)

RE: **PETITION NO. 1521** – EIP Communications I, LLC petition for a declaratory ruling, pursuant to Connecticut General Statutes §4-176 and §16-50k, for the proposed replacement and extension of an existing telecommunications facility located at 75 Wells Road, Wethersfield, Connecticut.

Dear Attorney Baldwin:

The Connecticut Siting Council (Council) requests your responses to the enclosed questions no later than July 25, 2022.

Please submit an original and 15 copies to the Council's office and an electronic copy to [siting.council@ct.gov](mailto:siting.council@ct.gov). In accordance with the State Solid Waste Management Plan and in accordance with Section 16-50j-12 of the Regulations of Connecticut State Agencies, the Council requests all filings be submitted on recyclable paper, primarily regular weight white office paper. Please avoid using heavy stock paper, colored paper, and metal or plastic binders and separators. Fewer copies of bulk material may be provided as appropriate.

**Please be advised that the original and 15 copies are required to be submitted to the Council's office on or before the July 25, 2022 deadline.**

Copies of your responses are required to be provided to all parties and intervenors listed in the service list, which can be found on the Council's website under the "Pending Matters" link.

Any request for an extension of time to submit responses to interrogatories shall be submitted to the Council in writing pursuant to §16-50j-22a of the Regulations of Connecticut State Agencies.

Sincerely,

A handwritten signature in blue ink, appearing to read "Melanie Bachman".

Melanie Bachman  
Executive Director

MB/IN

**Petition No. 1521**  
**EIP Communications I, LLC**  
**75 Wells Road, Wethersfield, Connecticut**

**Interrogatories**

1. What is the total cost of the proposed project? How would the tower construction costs be recovered?
2. With reference to page 6 section 4B of the petition, were any comments received from the Town or any of the abutting property owners?
3. What is the size of the proposed expanded area of the equipment compound?
4. Provide the distance of the tower center from the Frontier building.
5. Provide the diameters of the existing and proposed towers.
6. Which entity is driving the minimum height of the proposed facility?
7. Please provide the number of channels for each proposed antenna.
8. Would the proposed/relocated antennas provide 5G services? If yes, in what frequency range?
9. What is the maximum number of wireless carriers that the tower can support?
10. Provide a structural analysis for the proposed replacement monopole including the loading associated with all carriers that would locate on the tower.
11. What type of antenna mounts would be used for the proposed/relocated antennas? What is the structural design standard applicable to such antenna mounts?
12. Provide a mount analysis for the proposed/replacement antenna mounts.
13. Would the proposed replacement monopole have a galvanized gray finish or a different color/finish? Explain.
14. Would the proposed replacement monopole be designed with a yield point? If so at what height?
15. Quantify the amounts of cut and fill that would be required to develop the proposed facility.
16. Could the construction or operation of the proposed facility impact or interfere with any of the existing nearby public utilities such as the overhead wires shown in the project construction plans (Attachment 1).
17. What is the distance and direction of the nearest wetland area to the proposed facility?

18. Is the proposed facility within a Department of Energy and Environmental Protection-designated Aquifer Protection Area?
19. Provide construction work days/hours and the anticipated duration of construction.
20. Does the Petitioner intend to include a request for approval of T-Mobile's antenna installation at the proposed facility? If so, provide existing and "existing plus proposed" coverage maps for the proposed facility?
21. Does the Petitioner intend to include a request for approval of AT&T's antenna installation at the proposed facility? If so, provide existing and "existing plus proposed" coverage maps for the proposed facility.
22. Identify distances and directions to the adjacent sites with which the proposed facility would hand off signals. Include locations, tower types, and AT&T and T-Mobile antenna centerline heights at these sites.
23. Could a backup generator be shared by other carriers that may locate at the proposed facility? What effect would a shared generator have on the run time of the generator if at full load?
24. Would a battery backup (if applicable) be used for AT&T and T-Mobile to provide uninterrupted power and prevent a reboot condition? How long could the battery backup alone supply power to the facility in the event that the generator fails to start?
25. Petition page 1 states, "The existing tower is not structurally capable of supporting facility upgrades needed by AT&T and T-Mobile." Petition page 5 and the Radio Frequency Emissions Report behind Attachment 5 confirm that the **existing** T-Mobile and AT&T antennas on the replacement tower will operate within the FCC RF emissions standards (emphasis added.) Why would AT&T and T-Mobile install their existing equipment rather than the upgraded equipment on the replacement tower?
26. When would AT&T and T-Mobile install their upgraded equipment on the replacement facility, if it is approved, and how would AT&T and T-Mobile apply for the approval to install the upgraded equipment on the replacement facility?
27. Petition page 4 and the Site Plans note an existing air navigation beacon. What regulatory entity required inclusion of the beacon when the existing tower was constructed? What is the light color and strobe sequence, if applicable, of the existing beacon? Would the same type of beacon be required for the replacement tower? What FAA marking and lighting scheme would apply to the beacon for the replacement tower?
28. Identify the nearest "Important Bird Area" as designated by the National Audubon Society?
29. Would the proposed replacement tower comply with the USFWS Recommended Best Practices for Communication Tower Design, Siting, Construction, Operation, Maintenance and Decommissioning? (available at <https://www.fws.gov/sites/default/files/documents/usfws-communication-tower-guidance.pdf>)
30. How many acres of additional visibility would result from construction of the proposed replacement tower? Characterize the additional visibility from the surrounding areas.

31. Would the existing tower and equipment compound area be decommissioned/dismantled? If so, how would the existing tower and equipment compound area be restored?
32. Would AT&T's and T-Mobile's, proposed co-location(s) support text-to-911 service? Is additional equipment required for this purpose?
33. Would AT&T and T-Mobile's antennas comply with federal E911 requirements?
34. Would AT&T's and T-Mobile's installation(s) comply with the intent of the Warning, Alert and Response Network Act of 2006?
35. What, if any, stealth tower design options would be feasible to employ at this site? Please provide costs related to each stealth tower design.
36. Would the proposed facility comply with Department of Energy and Environmental Protection noise control standards at the property boundaries?
37. What measures are proposed for the site to ensure security and deter vandalism? (Including alarms, gates, locks, anti-climb fence design, etc.)
38. Identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.