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November 8, 2023

Via Electronic Mail and Federal Express

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Petition No. 1594 - Cellco Partnership d/b/a Verizon Wireless for a Declaratory Ruling on the Need to Obtain a Siting Council Certificate for the Installation of a Wireless Telecommunications Facility at 19 Doubling Road, Greenwich, Connecticut**

Petitioner's Responses to Council Interrogatories

Dear Attorney Bachman:

On behalf of Cellco Partnership d/b/a Verizon Wireless ("Cellco"), enclosed please find the original and fifteen (15) copies of Cellco's Responses to Council Interrogatories related to Petition No. 1594. Electronic copies of these responses have also been mailed to the Council today.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Kenneth C. Baldwin

KCB/kia
Enclosure

28220075-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
	:	
A PETITION OF CELLCO PARTNERSHIP	:	PETITION NO. 1594
D/B/A VERIZON WIRELESS FOR A	:	
DECLARATORY RULING ON THE NEED TO	:	
OBTAIN A SITING COUNCIL CERTIFICATE	:	
FOR THE INSTALLATION OF A WIRELESS	:	
TELECOMMUNICATIONS FACILITY AT 19	:	
DOUBLING ROAD, GREENWICH,	:	
CONNECTICUT	:	NOVEMBER 8, 2023

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO
CONNECTICUT SITING COUNCIL INTERROGATORIES

On October 26, 2023, the Connecticut Siting Council (“Council”) issued Interrogatories to Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to Petition No. 1594. Below are Cellco’s responses.

Notice

Question No. 1

Referencing Petition, Section III-B, and Attachments 7 & 8, has the Town of Greenwich and/or any abutting property owners provided comments to Cellco Partnership d/b/a Verizon Wireless (Cellco) since the Petition filing? If so, please summarize the comments.

Response

Cellco has received no comments directly from any Town officials but received copies of comments recently submitted to the Council by the Town’s Planning and Zoning and Conservation Commissions. Cellco’s Legal Counsel was contacted by two abutting property owners, Karen Gianuzzi at 7 Fairway Lane and Barton Goodwin at 29 Fairway Lane. Both abutters asked questions about the service the proposed facility would provide to the area and the

appearance of the antenna structures. Both abutters also acknowledged the substantial need for improved wireless services at their homes and in the area around the Greenwich Country Club.

Proposed Site

Question No. 2

Referring to Petition pp. 1-2, is the site for coverage or capacity needs? Provide more information as to Cellco's network objectives in this area.

Response

The Greenwich 4 Facility is primarily a coverage site providing new wireless service to a 0.75 square mile at -85dBm RSRP and 1.3 square mile at -95 dBm RSRP of 700MHz frequency to the portion of central Greenwich. This primarily residential area of Greenwich remains largely underserved by Cellco (and other wireless carriers). Finding a willing property owner who might allow for the development of a tower site in central Greenwich has been challenging. The use of existing tall structures, like the clubhouse at GCC, present Cellco with a unique opportunity to meet a portion of its service objectives when other more favorable alternative (a tower) is not an option.

Question No. 3

What target areas would the proposed facility serve to improve coverage? For what target areas and/or adjacent sites would the proposed facility improve capacity and/or provide capacity relief, if applicable?

Response

Given the limited height offered by the GCC Clubhouse roof, the target area for the Greenwich 4 Facility is the GCC Property itself and the surrounding residential areas, including portions of North Street, Stanwich Road, Doubling Road Fairway Lane, Hill Road, Alpha Drive and Wyngate Road. The existing and proposed wireless service in the area is clearly depicted on

the 700 MHz coverage plots included in Attachment 1. The Greenwich 4 cell site will interact with several of Cellco's small cell facilities in the area including Greenwich SC 19, a utility pole attachment near 427 Old Church Road and Greenwich SC 8, a utility pole attachment along Valley Road and Greenwich SC 6, a utility pole attachment along Hillside Road. The Greenwich 4 cell site will also help offload low-band traffic from the RIVERSIDE CT (Gamma Sector) antennas which is currently operating in exhaust.

Question No. 4

Provide the distance and direction of the nearest property boundary.

Response

The GCC clubhouse building is setback approximately 809 feet from the nearest property boundary to the west.

Question No. 5

Provide the distance and direction of the nearest residential structure.

Response

The nearest residential structure to the GCC clubhouse building is approximately 870 feet to the west, a residence located at 10 Golf Club Road in Greenwich.

Proposed Facility and Associated Equipment

Question No. 6

What is the estimated cost of the proposed project?

Response

The estimated cost for the proposed project is approximately \$300,000.

Question No. 7

Is the project, or any portion of the project, proposed to be undertaken by state departments, institutions or agencies, or to be funded in whole or in part by the state through any

contract or grant?

Response

No.

Question No. 8

Provide typical construction workdays and hours, and the anticipated duration of construction.

Response

Cellco anticipates its hours of construction to be between 7 a.m. and 4 p.m. Monday through Saturday and expects the construction to last 12-15 weeks.

Question No. 9

Referring to Petition p. 4, how would the faux chimney screens be maintained throughout the useful life of the facility (ex. painting to match the existing chimneys)?

Response

The faux chimney screening panels will be a thermoplastic radio frequency (RF) transparent material designed and painted to match the existing chimney features on the Clubhouse building. Cellco expects little need for regular maintenance of the screening structures.

Question No. 10

Provide a photograph of the existing screen fence behind which the proposed ground equipment would be installed.

Response

The photograph of the existing fence near the northeast corner of the GCC clubhouse building is included in Attachment 2.

Question No. 11

What is the height of the existing screen fence that would enclose the ground cabinets?

What is the height of the ground cabinets?

Response

The existing white fence shown in Attachment 2 is approximately 6' (72") tall. The black fence is approximately 8'-6" (102") tall. Cellco's equipment and battery cabinets are 84" and 72" tall respectively. The existing white fence shown in Attachment 2 will be removed and replaced with a fence that matches the existing black fence in color, height, and architectural appearance after the GCC installs its new back up generator.

Question No. 12

What limitations, if any, would the proposed facility design create for any future upgrades? Explain.

Response

The existing antenna support and screening structures are designed to permit reasonable antenna and equipment upgrades without any significant modifications to the antenna support structures or the antenna screening. If more significant modifications are deemed necessary, Cellco will notify the Council and file for any required approvals.

Public Safety

Question No. 13

Would the proposed equipment installation be capable of supporting text-to-911 service and comply with federal E911 requirements and the Warning, Alert and Response Network Act of 2006?

Response

Yes.

Question No. 14

What measures are proposed for the site to ensure security and deter vandalism?

(Including alarms, gates, locks, etc.)

Response

Rooftop antennas and antenna support structures are not accessible from the Clubhouse or the surrounding grounds. Cellco's ground-based equipment will be installed behind a new wood fence near the northeast corner of the GCC clubhouse. Cellco's equipment cabinets are locked and maintain silent intrusion alarms, monitored remotely by Cellco's cell site technicians. Finally, existing security measures in place at the GCC will also effectively help to deter vandalism of Cellco's wireless equipment.

Question No. 15

Identify the safety standards and/or codes by which equipment, machinery or technology that would be used or operated at the proposed facility.

Response

- 2021 International Building Code (IBC), with the 2022 Connecticut State Building Code amendments.
- National Electric Code (NFPA 70).
- 2021 International Mechanical Code, with the 2022 Connecticut State Building Code amendments.
- 2022 Connecticut State Fire Safety Code.
- ANSI/TIA-222-H "Structural Standard for Antenna Supporting Structures and Antennas and Small Wind Turbine Support Structures".
- Occupational Safety and Health Administration (OSHA).

Question No. 16

Referring to Petition Site Plan C-4, describe how the existing chimney would be removed.

Response

The existing masonry faux chimney is to be demolished down to the top of existing roof level. All masonry below this level is to remain for connection of the proposed enclosure.

Question No. 17

Referring to Petition Site Plan C-4, what building material was used to construct the existing chimney that is to be removed? Is the existing chimney to be removed a functioning chimney? Would interior construction and modifications also be required for its removal and the installation of the faux chimney? Explain.

Response

The current chimney is a decorative brick masonry structure that doesn't serve any functional purpose and is supported by a steel framework positioned just beneath the roof structure. Except for minor alterations needed to accommodate the installation of coaxial cables leading to the planned antenna enclosure, Cellco does not expect any interior construction work would be necessary when removing the decorative chimney.

Emergency Backup Power

Question No. 18

Referring to Petition Site Plan C-2,

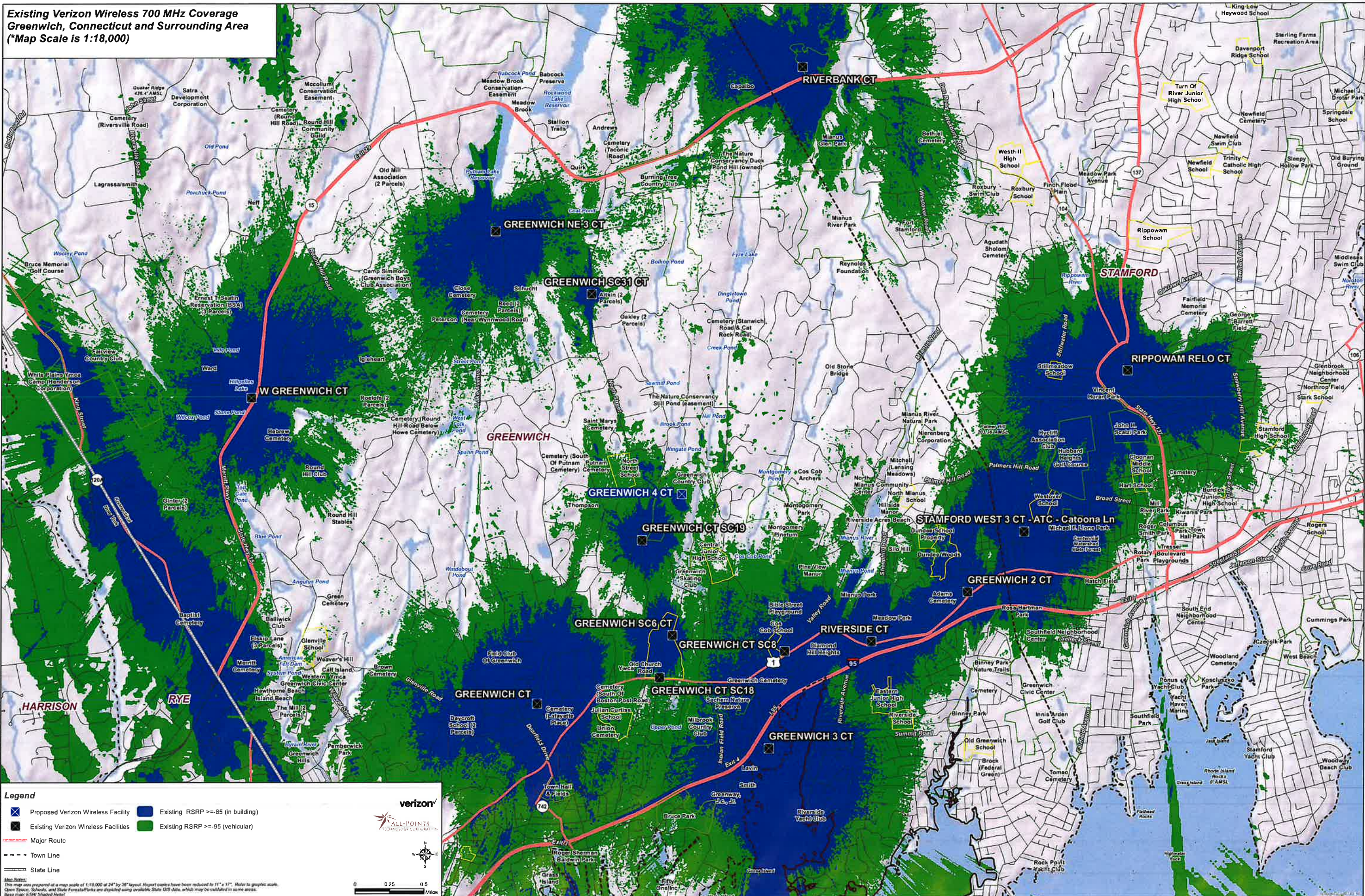
- a. does the proposed facility have an emergency backup power battery cabinet?
If yes, what is the anticipated run time of the battery?
- b. provide information including run time, fuel type and fuel containment system for the new country club generator.

Response

- a. Yes. Cellco will install a backup battery cabinet in the equipment area near the northeast corner of the GCC clubhouse. The battery will provide backup power to the facility for 4 to 8 hours depending upon load.
- b. Cellco understands that the GCC intends to install a new 750 kW generator which will provide backup power to the GCC facilities and Cellco's Greenwich 4 cell site. The new generator will be fueled by natural gas, tapping into existing service at the GCC clubhouse. Therefore, no fuel containment will be necessary. Unless there is a disruption in natural gas service, the new GCC generator will run continuously, without interruption, until commercial power is restored.

ATTACHMENT 1

**Existing Verizon Wireless 700 MHz Coverage
Greenwich, Connecticut and Surrounding Area
(*Map Scale is 1:18,000)**



- Legend**
- Proposed Verizon Wireless Facility
 - Existing RSRP >=85 (in building)
 - Existing Verizon Wireless Facilities
 - Existing RSRP >=95 (vehicular)
 - Major Route
 - Town Line
 - State Line



Map Notes:
This map was prepared at a map scale of 1:18,000 at 24" by 36" layout. Report copies have been reduced to 11" x 17". Refer to graphic scale.
Open Spaces, Schools, and State Forests/Parks are depicted using available State GIS data, which may be updated in some areas.
Base map: ESRI Shaded Relief

ATTACHMENT 2

