

DOCKET NO. 495A - Cellco Partnership d/b/a Verizon Wireless	}	Connecticut
Certificate of Environmental Compatibility and Public Need for	}	
the construction, maintenance, and operation of a	}	Siting
telecommunications facility located 5151 Park Avenue, Fairfield,	}	
Connecticut. Reopening of this Certificate based on changed	}	Council
conditions pursuant to Connecticut General Statutes §4-		
181a(b).		June 3, 2022

DRAFT

Findings of Fact

Introduction

1. On October 16, 2020, Cellco Partnership d/b/a Verizon Wireless (Cellco or Applicant), in accordance with provisions of Connecticut General Statutes (C.G.S.) §16-50g, et seq, applied to the Connecticut Siting Council (Council) for a Certificate of Environmental Compatibility and Public Need (Certificate) for the construction, maintenance, and operation of a 130-foot monopole wireless telecommunications facility on the Sacred Heart University (SHU) Main Campus at 5151 Park Avenue in Fairfield, Connecticut. (Docket 495). (Council Administrative Notice Item No. 35 - Docket 495 Record)
2. The purpose of the proposed wireless telecommunications facility was to replace an existing Cellco facility (Plattsville) located on the roof of Pierre Toussaint Hall, a residential dormitory building in the center of the SHU campus, that was to be removed at the request of SHU due to access and security concerns. (Council Administrative Notice Item No. 35 - Docket 495 Record)
3. The proposed replacement facility was to be located in the northwestern portion of the SHU campus, 175 feet south of Jefferson Street. (Council Administrative Notice Item No. 35 - Docket 495 Record)
4. Cellco is a Delaware Partnership with an office located at 20 Alexander Drive, Wallingford, Connecticut. Cellco is licensed by the Federal Communications Commission (FCC) to provide personal wireless communication service in the State of Connecticut. (Council Administrative Notice Item No. 35 - Docket 495 Record)
5. The party to the original Docket 495 proceeding was Cellco. (Council Administrative Notice Item No. 35 - Docket 495 Record)
6. At a public meeting held on April 26, 2021, the Council issued a Certificate to Cellco, finding that the construction, maintenance and operation of the proposed facility at the proposed location on the SHU campus in Docket 495 (Certificated Facility) would not have a substantial adverse environmental effect. (Council Administrative Notice Item No. 35 - Docket 495 Record)
7. On November 8, 2021, Cellco, New Cingular Wireless, LLC (AT&T) and T-Mobile Northeast, LLC (T-Mobile), collectively, "Petitioners," submitted a joint petition to the Council for a declaratory ruling for the proposed installation of a 125-foot temporary tower adjacent to the Valentine Health and Recreation Hall on the SHU campus, approximately 700 feet southeast of the Certificated Facility, due to the removal of the Petitioners' existing telecommunications equipment from the roof of Pierre Toussaint Hall in January 2022 (Petition 1470). (Council Administrative Notice Item No. 36 – Petition 1470 Record)

8. Petition 1470 referenced Cellco's future intent, in coordination with SHU, to submit a Motion to Reopen Docket 495 for the proposed relocation of the Certificated Facility from the approved site in the northwest corner of the SHU campus to a proposed site in the southeast corner of the SHU campus. (Council Administrative Notice Item No. 36 – Petition 1470 Record)
9. The proposed relocation of the Certificated Facility described in Petition 1470 is a site adjacent to the William H. Pitt Health and Recreation (Pitt) Center and SHU football field, approximately 1,350 feet southeast of the Certificated Facility that was rejected as an alternative by SHU during the Docket 495 proceeding due to interference with existing uses in and around the Pitt Center and SHU football field. (Council Administrative Notice Item No. 35 and 36 - Docket 495 Record and Petition 1470 Record)
10. On December 20, 2021, the Council issued a Declaratory Ruling to the Petitioners for the installation of the temporary facility in Petition 1470. (Council Administrative Notice Item No. 36 – Petition 1470 Record)
11. On February 11, 2022, pursuant to C.G.S §4-181a(b), Cellco filed a Motion to Reopen and Modify the Council's April 22, 2021 final decision to issue a Certificate to Cellco for the wireless telecommunications facility in Docket 495 (Motion to Reopen) with the Council. (Cellco 1)
12. Cellco's Motion to Reopen presented the new site adjacent to the Pitt Center and SHU football field, approximately 1,350 feet southeast of the Certificated Facility for the construction, maintenance and operation of a wireless telecommunications facility (Relocated Facility). (Refer to Figure 1). The Motion to Reopen also proposed a modified design for the Relocated Facility. (Cellco 1)
13. On February 14, 2022, the Council issued a memorandum acknowledging receipt of Cellco's Motion to Reopen that would be placed on the Council meeting agenda for February 24, 2022 for Council consideration. (Record)
14. During a public meeting of the Council held on February 24, 2022, the Council granted Cellco's Motion to Reopen and to schedule a public hearing on March 31, 2022 in accordance with CGS §4-181a(b), designating the matter as Docket No. 495A. (Record)
15. The party in this Docket 495A proceeding is Cellco. The Intervenor in this Docket 495A proceeding is AT&T. (Transcript 1- March 31, 2022, 2 p.m. [Tr. 1]. p. 6)

Procedural Matters

16. On March 10, 2020, Governor Lamont issued a Declaration of Public Health and Civil Preparedness Emergencies, proclaiming a state of emergency throughout the state as a result of the COVID-19 pandemic. (Council Administrative Notice Items No. 58 and 59)
17. On March 12, 2020, Governor Lamont issued Executive Order No. (EO) 7 ordering a prohibition of large gatherings, among other orders and directives. (Council Administrative Notice Item No. 58).
18. On March 14, 2020, and as subsequently extended, Governor Lamont issued EO 7B ordering suspension of in-person open meeting requirements of all public agencies under CGS §1-225. The Freedom of Information Act (FOIA) defines "meeting" in relevant part as "any hearing or other

- proceeding of a public agency.” (Council Administrative Notice Items No. 54 and 55; CGS §1-200, *et seq.* [2021]).
19. EO 7B expired on June 30, 2021. Special Act (SA) 21-2 took effect on July 1, 2021. SA 21-2 Section 149 permits public agencies to hold remote meetings under FOIA and the Uniform Administrative Procedure Act until April 30, 2022.¹ (Council Administrative Notice Items No. 58 and 59).
 20. SA 21-2 allows public agencies to hold remote meetings provided that:
 - a) The public has the ability to view or listen to each meeting or proceeding in real-time, by telephone, video, or other technology;
 - b) Any such meeting or proceeding is recorded or transcribed and such recording or transcript shall be posted on the agency’s website within seven (7) days of the meeting or proceeding;
 - c) The required notice and agenda for each meeting or proceeding is posted on the agency’s website and shall include information on how the meeting will be conducted and how the public can access it any materials relevant to matters on the agenda shall be submitted to the agency and posted on the agency’s website for public inspection prior to, during and after the meeting; and
 - d) All speakers taking part in any such meeting shall clearly state their name and title before speaking on each occasion they speak.(Council Administrative Notice Items No. 58 and 59)
 21. On February 25, 2022, the Council provided notice of its decision to reopen Docket 495 to consider the proposed Relocated Facility. (Record)
 22. Pursuant to SA 21-2 and C.G.S. §16-50m, on February 28, 2022, the Council sent letters to the Town and the municipalities of Bridgeport, Easton and Trumbull to provide notification of the scheduled public hearing and to invite the municipalities to participate. (Record)
 23. Pursuant to SA 21-2 and C.G.S. §16-50m, the Council published legal notice of the date and time of the public hearing in the Connecticut Post on March 3, 2022. (Record; Tr. 1, p. 5)
 24. The Council’s Hearing Notice did not refer to an in-person field review of the proposed site. Field reviews are not an integral part of the public hearing process. The purpose of a site visit is an investigative tool to acquaint members of a reviewing commission with the subject property. (Council Administrative Notice Item No. 60)
 25. On March 3, 2022, in lieu of an in-person field review of the proposed site, the Council requested that Cellco submit photographic documentation of site-specific features into the record intended to serve as a “virtual” field review of the site. On March 17, 2022, Cellco submitted such information in response to the Council’s interrogatories. (Record; Cellco 3, response 8)
 26. On March 9, 2022, the Council held a remote pre-hearing conference on procedural matters for parties and intervenors to discuss the requirements for pre-filed testimony, exhibit lists, administrative notice lists, expected witness lists and filing of pre-hearing interrogatories. Procedures for the remote public hearing via Zoom conferencing were also discussed. (Council Pre-Hearing Conference and remote hearing procedure memoranda, dated March 2, 2022)

¹ Public Act 22-3 passed on April 28, 2022, allowing for remote agency meetings and public hearings as of July 1, 2021

27. On March 19, 2022, in compliance with R.C.S.A. §16-50j-21, the Applicant installed a four-foot by six-foot sign at the entrance to the SHU campus on Jefferson Street. The sign presented information regarding the proposed Relocated Facility and the Council's public hearing. (Cellco 3)
28. Pursuant to C.G.S. §16-50m, the Council, after giving due notice thereof, held a remote public hearing on March 31, 2022, beginning with the evidentiary session at 2:00 p.m. and continuing with the public comment session at 6:30 p.m. via Zoom conferencing. The Council provided information for video/computer access or audio only telephone access. (Council's Hearing Notice dated February 28, 2022; Tr. 1, p. 1; Transcript 2 - March 31, 2022, 6:30 p.m. [Tr. 2], p. 104)
29. In compliance with SA 21-2:
 - a) The public had the ability to view and listen to the remote public hearing in real-time, by computer, smartphone, tablet or telephone;
 - b) The remote public hearing was recorded and transcribed, and such recording and transcript were posted on the Council's website on March 31, 2022, and April 20, 2022, respectively;
 - c) The Hearing Notice, Hearing Program, Citizens Guide for Siting Council Procedures and Instructions for Public Access to the Remote Hearing were posted on the agency's website;
 - d) The record of the proceeding is available on the Council's website for public inspection prior to, during and after the remote public hearing; and
 - e) The Council, parties and intervenors provided their information for identification purposes during the remote public hearing. (Hearing Notice dated February 28, 2022; Tr. 1; Tr. 2; Record)
30. Pursuant to C.G.S. §16-50n(f), during a regular meeting held on April 21, 2022, the Council closed the evidentiary record for Docket 495A and established March 17, 2022 as the deadline for the submission of briefs and proposed findings of fact. (Record)

Municipal Consultation

31. Courtesy copies of the Motion to Reopen were sent to Town of Fairfield (Town) officials and owners of properties abutting the SHU campus on February 11, 2022. Abutting property owners are shown on an Abutters Site Plan and an aerial image Property Abutters map (refer to Figure 2). (Cellco 1, Ex 2 - Abutters Plan; Cellco April 8, 2022 Late File Exhibit - response 4)
32. The Town Planning Director submitted comments to the Council on March 24, 2022, stating that some aspects of the modified tower design do not meet Town zoning regulations and that a proposed bell may impact residences in the area. (Record)
33. Local zoning regulations do not apply to facilities under the exclusive jurisdiction of the Council. Pursuant to CGS §16-50x, the Council has exclusive jurisdiction over telecommunications facilities throughout the state. It shall consider any location preferences provided by the host municipality under CGS §16-50gg as the Council shall deem appropriate. (CGS §16-50x (2021))

State Agency Comment

34. Pursuant to C.G.S. § 16-50j(g), on February 28, 2022, the following state agencies were solicited by the Council to submit written comments regarding the proposed facility: Department of Energy

and Environmental Protection (DEEP); Department of Public Health (DPH); Council on Environmental Quality (CEQ); Public Utilities Regulatory Authority (PURA); Office of Policy and Management (OPM); Department of Economic and Community Development (DECD); Department of Agriculture (DOAg); Department of Transportation (DOT); Connecticut Airport Authority (CAA); Department of Emergency Services and Public Protection (DESPP); and State Historic Preservation Office (SHPO). (Record)

35. On December 9, 2020 and March 7, 2022, the Council received comments from the CAA². The comments are addressed in the following section of this document: Public Safety. (Council Administrative Notice Item No. 35 - Docket 495 Record; Record)
36. No other state agencies responded with comment on the application. (Record)
37. While the Council is obligated to consult with and solicit comments from state agencies by statute, the Council is not required to abide by the comments from state agencies. (*Corcoran v. Connecticut Siting Council*, 284 Conn. 455 (2007)).

Changed Conditions

38. In Cellco's Motion to Reopen, it noted several changed conditions from the Certificated Facility to the proposed Relocated Facility, including, but not limited to, the following:
 - a) Subsequent to the Council's approval of the Certificated Facility, SHU met with neighbors and Town officials regarding potential alternative tower locations on the SHU campus.
 - b) The Relocated Facility is approximately 1,350 feet southeast of the approved Certificated Facility;
 - c) The Relocated Facility is proposed as a 100-foot tall, three-pole faux bell tower telecommunications facility;
 - d) The Relocated Facility would include a new building to provide space for telecommunication carriers' equipment and storage space for SHU;
 - e) The Relocated Facility has no residences within 1,000 feet of the site compared to 40 residences within 1,000 feet of the Certificated Facility; and,
 - f) The Relocated Facility would not be visible above the tree line from any residence within 0.25 mile of the site compared to several residences with views of the upper 10 to 70 feet of the Certificated Facility within 0.1 mile of that site.(Cellco 1, pp. 1-4, Exhibit 1; Cellco 3, response 15; (Council Administrative Notice Item No. 35 and 36 - Docket 495 Record)

Public Need for Service

39. In 1996, the United States Congress recognized a nationwide need for high quality wireless telecommunications services, including cellular telephone service. Through the Federal Telecommunications Act of 1996, Congress seeks to promote competition, encourage technical innovations, and foster lower prices for telecommunications services. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
40. In issuing cellular licenses, the Federal government has preempted the determination of public need for cellular service by the states and has established design standards to ensure technical integrity and nationwide compatibility among all systems. Cellco is licensed by the FCC to provide personal

² [D495a-caa comments-2022 0307](#)

wireless communication service to Connecticut. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996; Docket 495 Record)

41. Section 253 of the Telecommunications Act of 1996 prohibits any state or local statute or regulation, or other state or local legal requirement from prohibiting or having the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunications service. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
42. Section 704 of the Telecommunications Act of 1996 prohibits local and state entities from discriminating among providers of functionally equivalent services and from prohibiting or having the effect of prohibiting the provision of personal wireless services. This section also requires state or local governments to act on applications within a reasonable period of time and to make any denial of an application in writing supported by substantial evidence in a written record. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
43. Section 704 of the Telecommunications Act of 1996 also prohibits any state or local entity from regulating telecommunications towers on the basis of the environmental effects of radio frequency emissions, which include effects on human health and wildlife, to the extent that such towers and equipment comply with FCC's regulations concerning such emissions. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
44. Section 706 of the Telecommunications Act of 1996 requires each state commission with regulatory jurisdiction over telecommunications services to encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans, including elementary and secondary schools, by utilizing regulating methods that promote competition in the local telecommunications market and remove barriers to infrastructure investment. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
45. In December 2009, President Barack Obama recognized cell phone towers as critical infrastructure vital to the United States. The Department of Homeland Security, in collaboration with other federal stakeholders, state, local, and tribal governments, and private sector partners, has developed the National Infrastructure Protection Plan (NIPP) to establish a framework for securing resources and maintaining resilience from all hazards during an event or emergency. (Council Administrative Notice Item No. 11–Presidential Proclamation 8460, Critical Infrastructure Protection)
46. In February 2012, Congress adopted the Middle Class Tax Relief and Job Creation Act (also referred to as the Spectrum Act) to advance wireless broadband service for both public safety and commercial users. The Act established the First Responder Network Authority to oversee the construction and operation of a nationwide public safety wireless broadband network. Section 6409 of the Act contributes to the twin goals of commercial and public safety wireless broadband deployment through several measures that promote rapid deployment of the network facilities needed for the provision of broadband wireless services. (Council Administrative Notice Item No. 8 – Middle Class Tax Relief and Job Creation Act of 2012)
47. In June 2012, President Barack Obama issued an Executive Order to accelerate broadband infrastructure deployment declaring that broadband access is a crucial resource essential to the nation's global competitiveness, driving job creation, promoting innovation, expanding markets for American businesses and affording public safety agencies the opportunity for greater levels of effectiveness and interoperability. (Council Administrative Notice Item No. 12 – Presidential Executive Order 13616, Accelerating Broadband Infrastructure Development; Council Administrative Notice Item No. 23 – FCC Wireless Infrastructure Report and Order)

48. Pursuant to Section 6409(a) of the Spectrum Act, a state or local government may not deny and shall approve any request for collocation, removal or replacement of equipment on an existing wireless tower provided that this does not constitute a substantial change in the physical dimensions of the tower. (Council Administrative Notice Item No. 8 – Middle Class Tax Relief and Job Creation Act of 2012; Council Administrative Notice Item No. 23 – FCC Wireless Infrastructure Report and Order)
49. In June 2020, the FCC issued a declaratory ruling that heights of existing towers located outside of the public right-of-way could increase by up to 20 feet plus the height of a new antenna without constituting a substantial change in the physical dimensions of a tower. (Council Administrative Notice Item No. 27)
50. In November 2020, the FCC issued an order that ground excavation or deployment up to 30 feet in any direction beyond the site boundary of existing towers located outside of the public right-of-way does not constitute a substantial change in the physical dimensions of a tower (Council Administrative Notice Item No. 28)
51. According to state policy, if the Council finds that a request for shared use of a facility by a municipality or other person, firm, corporation or public agency is technically, legally, environmentally and economically feasible, and the Council finds that the request for shared use of a facility meets public safety concerns, the Council shall issue an order approving such shared use to avoid the unnecessary proliferation of towers in the state. (Conn. Gen. Stat. §16-50aa)
52. On February 28, 2022, the Council sent correspondence to other telecommunications carriers, requesting that carriers interested in locating on the proposed facility in the foreseeable future to notify the Council by March 24, 2022. None of the carriers responded to the Council's solicitation. (Record)
53. The three-pole facility is designed to accommodate a minimum of four wireless carriers. (Cellco 1, Exhibit 1; Tr. 1, p. 26)

Cellco's Existing and Proposed Wireless Services

54. Cellco's proposed coverage area includes the SHU campus, Route 15, commercial and residential areas. Cellco intends to replace and improve upon service that was provided from its decommissioned rooftop facility and service that is currently provided by the temporary facility. (Council Administrative Notice Item No. 35 - Docket 495 Record; Cellco 1, Exhibit 3; Tr. 1, pp. 45-46)
55. Cellco's proposed facility would provide Long Term Evolution (LTE) service in the 700 MHz, 850 MHz, 1900 MHz and 2100 MHz frequencies. Cellco designs its LTE network using a -95 dB Reverse Link Operational Path Loss standard for reliable in-vehicle service and -85 Reverse Link Operational Path Loss standard for reliable in-building service. (Council Administrative Notice Item No. 35 - Docket 495 Record)

56. Cellco's proposed installation at the 95-foot and 68-foot levels of the Relocated Facility would provide the following wireless service:

	700 MHz Service	850 MHz Service	1900 MHz Service	2100 MHz Service
Route 15	3.5 miles	2.5 miles	0.6 miles	0.4 miles
Route 59	1.8 miles	1.0 miles	0.2 mile	0.2 mile
Coverage footprint	14.5 square miles	6.3 square miles	1.3 square miles	1.1 square miles

Refer to Figure 3. (Cellco 1, p. 9; Cellco 2, response 10)

57. The proposed Relocated Facility would improve Cellco's existing 700 MHz in-vehicle service by providing uninterrupted reliable coverage to 1.3 miles of CT State Route 15 (Merritt Parkway). Currently the existing rooftop facility only provides limited coverage to Route 15. (Cellco 1, Exhibit 3)
58. The proposed Relocated Facility would also provide additional capacity by increasing the number of wireless service frequencies from two to four. The decommissioned Plattsville facility was 200 percent above its capacity limits on the Gamma sector and 100 percent on the Alpha sector. Both sectors primarily serve the SHU campus and portions of the Merritt Parkway. By exceeding capacity limits, the sectors are not able to accommodate all of the customer service demands in that area. (Council Administrative Notice Item No. 35 - Docket 495 Record; Tr. 1, pp. 46-47)
59. In addition to coverage and capacity improvements from the Plattsville facility, the proposed Relocated Facility would also provide capacity relief to Cellco's existing Bridgeport NW 2 CT facility (Gamma sector) and Fairfield South facility (Alpha sector) which are both beyond their current capacity limits. (Council Administrative Notice Item No. 35 - Docket 495 Record)
60. The proposed Relocated Facility would be capable of offering 5G services once Cellco completes its 5G network build out in this area. (Council Administrative Notice Item No. 35 - Docket 495 Record)
61. Cellco's proposed Relocated facility would interact with surrounding existing facilities as shown in the following table:

Cellco Site Designation	Site Address	Distance/direction from Proposed Site	Structure Type
Fairfield	281 Woodward Ave, Fairfield	2.5 miles southwest	water tank
Trumbull Center	Monitor Hill Road, Trumbull	2.75 miles north	water tank
Trumbull 3 South	158 Edison Road, Trumbull	1.75 miles northeast	tower
North Bridgeport	1330 Chopsey Hill Road, Bridgeport	2.5 mile east	tower
Bridgeport NW	3885 Main Street, Bridgeport	2.0 miles southeast	rooftop
Bridgeport NW 2	3200 Park Ave., Bridgeport	2.0 miles south	building mount
Fairfield South	2228 Black Road Tpke, Fairfield	2.7 miles south	rooftop
Easton	515 Morehouse Road, Easton	2.2 miles northwest	tower

(Council Administrative Notice Item No. 35 - Docket 495 Record)

AT&T's Existing and Proposed Wireless Service

62. AT&T's proposed coverage area includes the SHU campus, Route 15, Jefferson Street, Park Avenue and surrounding commercial and residential areas. AT&T intends to replace and improve upon service that was provided from its decommissioned rooftop facility and service that is currently provided by the temporary facility. (AT&T 2, response 7, response 8; Tr. 1, p. 48)
63. AT&T's proposed facility would provide services in the 700 MHz, 850 MHz, 1900 MHz, 2100 MHz, 2300 MHz and 3500 MHz frequencies. AT&T designs its network using a -93 dBm standard for reliable in-vehicle service and -83 dBm standard for reliable in-building service. All frequency bands would be used to transmit voice and data. (AT&T 2, response 4, response 7, response 8)
64. AT&T's proposed installation at the 76.7-foot level of the Relocated Facility would provide the following wireless service:

	700 MHz Service (-93dBm)
Main Roads	1.9 miles
Secondary Roads	7.4 miles
Coverage footprint	1.2 square miles

Refer to Figure 4. (AT&T 2, response 7)

65. AT&T's proposed facility would also provide capacity relief to its 2 Kaechele Place, Bridgeport facility (Gamma sector) and to its installation on the temporary tower (Alpha sector), both of which serve the SHU campus and are beyond their current capacity limits. (AT&T 2, response 10)
66. AT&T's proposed facility would interact with surrounding existing facilities as shown in the following table:

Name	Address	Town	Latitude	Longitude	Type	Distance to Proposed	Direction
CT1323	515 Morehouse Road	Easton	41.2356	-73.2854	Monopole	2.40	NW
CT2084	2750 Reservoir Avenue	Trumbull	41.2383	-73.1937	Rooftop	2.97	ENE
CT2085	120 Huntington Turnpike	Bridgeport	41.2114	-73.1771	Rooftop	3.56	ESE
CT2088	2625 Park Avenue	Bridgeport	41.1932	-73.2167	Rooftop	2.30	SSE
CT2105	281 Wood House Road	Fairfield	41.1959	-73.2814	Monopole	2.48	SW
CT2106	2 Kaechele Place	Bridgeport	41.2233	-73.2168	Monopole	1.49	ENE
CT2128	3965 Congress Street	Fairfield	41.1884	-73.2991	Monopole	3.52	SW
CT2340	110 Merrimac Drive	Trumbull	41.2619	-73.2509	Water Tank	2.99	N
CT5086	3200 Park Avenue	Bridgeport	41.2008	-73.2210	Rooftop	1.76	SSE
CT5089	124 Quarry Road	Trumbull	41.2325	-73.1859	Utility	3.20	ENE
CT5090	2891 Nichols Avenue	Trumbull	41.2329	-73.1593	Utility	4.54	ENE
CT5093	1320 Chopsey Hill Road	Bridgeport	41.2196	-73.2013	Self Support	2.26	E
CT5100	220 Evergreen Street	Bridgeport	41.1978	-73.1907	Monopole	3.17	SE
CT5145	280 Morehouse Drive	Fairfield	41.2100	-73.2616	Utility	1.07	SW
CT5151	5065 Main Street Dup1	Trumbull	41.2303	-73.2267	Rooftop	1.23	NE

(AT&T 2, response 9)

67. AT&T's proposed facility would provide 5G services at the 850, 1900, 2100 and 3500 MHz frequencies. (AT&T 2, response 5)

Site Selection

68. Pursuant to RCSA §16-50j-2a(29), “Site” means a contiguous parcel of property with specified boundaries, including, but not limited to, the leased area, right-of-way, access and easements on which a facility and associated equipment is located, shall be located or is proposed to be located. (RCSA §16-50j-2a(29))
69. Once SHU determined it would seek an alternative location on the SHU campus, SHU and Cellco selected the proposed Relocated Facility. The use of an existing stadium light pole or installing a taller replacement light pole facility was rejected by SHU. (Cellco 2, response 1; Tr. 1, pp. 28-29)

Relocated Facility Description

70. The proposed Relocated Facility is in the southwestern portion of a 60.2-acre parcel that is part of the 80.1-acre SHU Main Campus. The parcel is owned by the Bridgeport Roman Catholic Diocesan Corporation. (Council Administrative Notice Item No. 35 - Docket 495 Record; Cellco 1, Exhibit 1)
71. The subject property is zoned Residential (R-3) and is used as a developed college campus. (Council Administrative Notice Item No. 35 - Docket 495 Record)
72. Land use immediately surrounding the subject parcel consists of a golf course to the south and west, commercial and residential use to the east and residential and campus use to the north. (Council Administrative Notice Item No. 35 - Docket 495 Record; Cellco 1, Exhibit 1)
73. The proposed site is located approximately 295 feet above mean sea level (amsl). (Cellco 1, Exhibit 2)
74. The proposed site is located in an area with mobile storage containers at the edge of a driveway that services the Pitt Center (refer to Figure 5). (Cellco 3, response 8; Cellco April 8, 2022 Late File – response 1; Tr. 1, pp. 17-19)
75. The proposed tower would consist of a 100-foot tall, three-pole telecommunications facility. The three-pole structure was initially designed as a faux bell tower with an SHU logo on fiberglass panels but during the proceeding, the bell and SHU logo were removed from the design. (Cellco 1, Exhibit 2; Cellco April 8, 2022 Late File – response 1; Tr. 1, pp. 25-26, 93-96)
76. The three poles would each have an approximate diameter of 55-inches and would be placed approximately 18 feet apart in a triangular arrangement. (Cellco 1, Exhibit 2; Tr. 1, pp. 22-23)
77. The three-pole tower would be designed to support four levels of antennas using a mix of interior flush mounted antennas and exterior platform mounted antennas. The upper portion of each pole could accommodate three interior flush-mount antennas at the 95-foot and 85-foot levels. The antenna would be concealed within a fiberglass casing. Two antenna platforms would be installed at the 77-foot and 67-foot levels of the tower, concealed by a fiberglass panel (refer to Figure 6). (Cellco April 8, 2022 Late File – response 1)
78. The fiberglass panels that conceal the antenna platforms would be 18 feet tall by 16 wide, reduced from 26-feet tall by 16 feet wide during the proceeding. The panels can be extended down to conceal a third platform if necessary for future tower sharing. (Cellco April 8, 2022 Late File – response 1; Tr. 1, pp. 49-50)

79. The three-pole tower would be painted light gray. (Cellco April 8, 2022 Late File – response 1)
80. Cellco would install two interior flush mounted antennas at the 95-foot level of each pole. Cellco would also install 8 antennas and 12 remote radio heads on an antenna platform at a centerline height of 68.5 feet. (Cellco 1, p. 4; Cellco April 8, 2022 Late File – response 1)
81. AT&T would install 12 panel antennas and 12 remote radio head/units on an antenna platform at a centerline height of 76.7 feet. (AT&T 2, response 1)
82. The Site Plans show T-Mobile locating interior-flush mount antennas at the 85-foot level of each pole. T-Mobile would be required to submit a request for tower sharing with the Council if the Relocated Facility is approved. (Cellco April 8, 2022 Late File – response 1; CGS §16-50aa (2021))
83. A two-story, 1,245 square foot building would be constructed at the base of the tower that would house radio equipment for the telecommunication carriers and provide storage space for SHU. Two equipment rooms on the second level would be accessed by a steel stairway. The building would have brick veneer to match the adjacent Pitts Center. (Cellco 1, pp. 3-4, Exhibit 2)
84. Cellco's radio equipment would be installed within a ground floor room. AT&T and T-Mobile's equipment would be located in separate rooms on the second level of the building. (Cellco April 8, 2022 Late File – response 1)
85. Access to the site would use existing SHU campus driveways. (Cellco April 8, 2022 Late File – response 1)
86. Electric service to the facility would be from a new 120-foot long underground cable that extends from the telecommunications building to a transformer adjacent to the Pitt Center. (Cellco April 8, 2022 Late File – response 1)
87. Telephone service would extend underground from existing service on Jefferson Street through wooded and lawn areas along the SHU property boundary to the telecommunications building, a distance of approximately 2,000 feet. (Cellco April 8, 2022 Late File – response 1)
88. No exterior lighting of the structure is proposed. Exterior motion lights would be installed on the telecommunications building at entry doors and storage area garage doors. (Tr. 1, p. 36)
89. There are approximately 40 residential structures within 1,000 feet of the Certificated Facility site. The nearest residence is located approximately 275 feet north of the Certificated Facility site. There are no residential structures within 1,000 feet of the proposed Relocated Facility site. The nearest residence is located approximately 1,250 feet to the southwest-west of the proposed Relocated Facility site. (Cellco 1, p. 5, Exhibit 2)
90. Site preparation and engineering would commence following Council approval of a Development and Management Plan (D&M Plan). The site would take five to six months to construct. Once all of the carriers are operational on the new facility, the temporary tower would be decommissioned and removed. (Tr. 1, pp. 33-34)

91. The estimated cost of Cellco's proposed facility is:

Three-pole tower	525,000
Telecommunications building	300,000
Generator	25,000
Cell site Equipment	50,000
Construction/Miscellaneous costs	100,000
Total Estimated Costs	\$1,000,000

(Cellco 3, response 2)

92. The estimated cost of AT&T's proposed facility is

Equipment/Materials	112,000
Construction	179,000
Integration/Optimization	15,300
Total Estimated Costs	\$306,300

(AT&T 2, response 2)

93. Both Cellco and AT&T would recover the costs of its equipment via the price of its services on a national level. (Cellco 3, response 2)

Public Safety

94. The Wireless Communications and Public Safety Act of 1999 (911 Act) was enacted by Congress to promote and enhance public safety by making 9-1-1 the universal emergency assistance number, by furthering deployment of wireless 9-1-1 capabilities, and by encouraging construction and operation of seamless ubiquitous and reliable networks for wireless services. (Council Administrative Notice Item No. 6 - Wireless Communications and Public Safety Act of 1999)
95. The proposed facility would be in compliance with the requirements of the 911 Act and would provide Enhanced 911 services. (Council Administrative Notice Item No. 35 - Docket 495 Record)
96. Wireless carriers have voluntarily begun supporting text-to-911 services nationwide in areas where municipal Public Safety Answering Points (PSAP) support text-to-911 technology. Text-to-911 will extend emergency services to those who are deaf, hard of hearing, have a speech disability, or are in situations where a voice call to 911 may be dangerous or impossible. However, even after a carrier upgrades its network, a user's ability to text-to-911 is limited by the ability of the local 911 call center to accept a text message. The FCC does not have the authority to regulate 911 call centers; therefore, it cannot require them to accept text messages. (Council Administrative Notice Item No. 22 – FCC Text-to-911: Quick Facts & FAQs)
97. Cellco's proposed facility would be capable of supporting text-to-911 service. (Council Administrative Notice Item No. 35 - Docket 495 Record)
98. Pursuant to the Warning, Alert and Response Network Act of 2006, "Wireless Emergency Alerts" (WEA) is a public safety system that allows customers who own enabled mobile devices to receive geographically-targeted, text messages alerting them of imminent threats to safety in their area. WEA complements the existing Emergency Alert System that is implemented by the FCC and FEMA at the federal level through broadcasters and other media service providers, including wireless carriers. Cellco's facility would support the WARN alert system. (Council Administrative Notice No. 5 – FCC WARN Act; Council Administrative Notice Item No. 35 - Docket 495 Record)

99. Pursuant to C.G.S. §16-50p(a)(3)(G), the tower would be constructed in accordance with the current governing standard in the State of Connecticut for tower design in accordance with the currently adopted International Building Code. (Council Administrative Notice Item No. 35 - Docket 495 Record; Tr. 1, pp. 87-88)
100. The proposed tower would not be an obstruction or hazard to air navigation and would not require obstruction marking or lighting, as determined by an aviation hazard screening tool. The CAA requested that Cellco file Form 7460 with the FAA. As required by the FAA, this form would be filed at least 45 days from the commencement of construction. (Cellco 3, response 9; Tr. 1, pp. 34-37; CAA comments dated March 3, 2022)
101. The tower setback radius* extends onto the abutting property (Fairchild Wheeler Golf Course) to the southeast by approximately 55 feet. Due to the three-pole structure being supported by cross arms (behind the fiberglass panels) and construction of the facility using current design standards and applicable building codes, a yield point on the tower would not be necessary. *the horizontal distance equal to the tower height that extends radially from the center of the tower. (Cellco 1, Exhibit 2; Tr. 1, pp. 87-88)
102. Noise from facility operation would not be significant. Construction noise is exempt from the DEEP Noise Control Regulations §22a-69-1.8(g), which includes, but is not limited to, “physical activity at a site necessary or incidental to the erection, placement, demolition, assembling, altering, blasting, cleaning, repairing, installing, or equipping of buildings or other structures, public or private highways, roads, premises, parks, utility lines, or other property.” (R.C.S.A. §22a-69-1.8(g); Council Administrative Notice Item No. 35 - Docket 495 Record)
103. The cumulative worst-case maximum power density from the radio frequency emissions from the operation of Cellco’s and AT&T’s proposed antennas would be approximately 79.6 percent for the General Public/Uncontrolled Maximum Permissible Exposure, as adopted by the FCC, at the base of the proposed tower (Cellco= 46.6%, AT&T = 33.0%)*. This calculation was based on methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) that assumes all antennas in a sector would be pointed at the base of the tower and all channels would be operating simultaneously, which creates the highest possible power density levels. Under normal operation, the antennas would be oriented outward, directing radio frequency emissions away from the tower, thus resulting in significantly lower power density levels in areas around the tower.

*This includes a 10 dB off-beam pattern loss to account for the lower relative gain below the antennas.

(Cellco 1, p. 7, Exhibit 8; Council Administrative Notice Item No. 2 – FCC OET Bulletin No. 65; Council Administrative Notice Item No. 36 – Petition 1470 Record)

Emergency Backup Power

104. In response to two significant storm events in 2011, Governor Malloy formed a Two Storm Panel (Panel) that was charged with an objective review and evaluation of Connecticut’s approach to the prevention, planning and mitigation of impacts associated with emergencies and natural disasters that can reasonably be anticipated to impact the state. (Final Report of the Two Storm Panel, Council Administrative Notice Item No. 54)

105. Consistent with the findings and recommendations of the Panel, and in accordance with C.G.S. §16-50ll, the Council, in consultation and coordination with DEEP, DESPP and PURA, studied the feasibility of requiring backup power for telecommunications towers and antennas as the reliability of such telecommunications service is considered to be in the public interest and necessary for the public health and safety. (Council Administrative Notice Item No. 34 – Council Docket No. 432)
106. Commercial Mobile Radio Service (CMRS) providers are licensed by and are under the jurisdiction and authority of the FCC. At present, no standards for backup power for CMRS providers have been promulgated by the FCC. Every year since 2006, AT&T, Sprint/T-Mobile, and Verizon have certified their compliance with the CTIA Business Continuity/Disaster Recovery Program and the Communications Security, Reliability and Interoperability Council standards and best practices to ensure network reliability during power outages. (Council Administrative Notice Item No. 34 – Council Docket No. 432)
107. A shared, 100-kW diesel-fueled emergency generator and an associated 192-gallon fuel tank would be installed on a concrete pad east of the proposed tower. Assuming all three carriers are using the backup generator during a power outage, it could run for up to 24 hours before refueling is necessary. (Cellco 1, Exhibit 2; Cellco 3, response 24; Tr. 1, pp. 63-64, 75, 78)
108. A larger fuel tank that allows for 3 days of backup power operation could be installed. (Tr. 1, pp. 75-76)
109. SHU was involved in the facility design process and approved a single, shared generator for the site. SHU will not allow a separate generator for each carrier. (Cellco April 8, 2022 Late File – response 3; Tr. 1, pp. 64-65)
110. To prevent a single point of failure, hookups for portable emergency generator can be installed on the telecommunications building for use if the shared generator fails to operate during a power outage. (Cellco April 8, 2022 Late File – response 3)
111. Cellco would also have a battery backup system integrated into its equipment cabinet in order to avoid a “re-boot” condition during the generator start-up delay period (approx. 5 seconds). The battery backup system alone could provide about one hour of backup power in the event the generator did not start. (Cellco 3, response 12; Tr. 1, pp. 30-31, 68)
112. AT&T would install battery backup system for their equipment. Although the exact type of battery has not yet been designed for this site, a typical battery backup system could provide two to four hours of power. (Tr. 1 p. 57)
113. The generator would be remotely tested and monitored periodically to ensure proper operation. (Council Administrative Notice Item No. 35 - Docket 495 Record)
114. According to R.C.S.A. §22a-69-1.8, noise created as a result of, or relating to, an emergency, such as an emergency backup generator, is exempt from the DEEP Noise Control Regulations. (R.C.S.A. §22a-69-1.8)
115. Pursuant to R.C.S.A. §22a-174-3b, the generator would be managed to comply with DEEP’s “permit by rule” criteria. Therefore, the generator would be exempt from general air permit requirements. (R.C.S.A. §22a-174-3b; Council Administrative Notice Item No. 35 - Docket 495 Record)

Environmental Considerations

116. No prime farmland soils would be affected by the Project. (Council Administrative Notice Item No. 35 - Docket 495 Record)
117. The Merritt Parkway, a National Scenic Byway listed on the National Register of Historic Places, is located approximately 0.5-mile northwest of the site. Cellco filed project documentation with SHPO but did not receive a formal response within 30 days. Therefore, under National Environmental Policy Act rules, the project will not have an adverse effect on cultural and historic resources. (Cellco 1, p.17; Tr. 1, pp. 72-74)
118. A stone wall is located along the southwest property line, abutting the Fairchild Wheeler Golf Course. Installation of the telco fiber line would not disturb the stone wall. (Cellco 3, response 8, Tr. 1, pp. 74-75)
119. The Inland Wetlands and Watercourses Act (IWWA), CGS §22a-36, *et seq.*, contains a specific legislative finding that the inland wetlands and watercourses of the state are an indispensable and irreplaceable but fragile natural resource with which the citizens of the state have been endowed, and the preservation and protection of the wetlands and watercourses from random, unnecessary, undesirable and unregulated uses, disturbance or destruction is in the public interest and is essential to the health, welfare and safety of the citizens of the state. (CGS §22a-36, *et seq.*)
120. The IWWA grants regulatory agencies with the authority to regulate upland review areas in its discretion if it finds such regulations necessary to protect wetlands or watercourses from activity that will likely affect those areas. (CGS §22a-42a)
121. The IWWA forbids regulatory agencies from issuing a permit for a regulated activity unless it finds on the basis of the record that a feasible and prudent alternative does not exist. (CGS §22a-41)
122. The nearest wetland area to the Relocated Facility is approximately 850 feet to the east in a wooded area straddling the property line between the SHU Campus and the Fairchild Wheeler Golf Course. The proposed telco fiber line extending underground from Jefferson Street to the Relocated Facility would be within 27 feet of a wetland that consists of a manmade pond type stormwater basin. (Cellco 1, p. 6)
123. The proposed tower site is level. Development of the site would require 104 cubic yards of cut and 44 cubic yards of fill. (Cellco 1, Exhibit 2; Cellco 3, response 4)
124. The proposed project would be constructed consistent with the *2002 Connecticut Guidelines for Soil Erosion and Sedimentation Control*. (Cellco 1, Exhibit 2)
125. No drainage improvements to the existing driveway, such as a catch basin, are proposed. (Cellco 1, Exhibit 2; Tr. 1, pp. 29-30)
126. The site is located in the Federal Emergency Management Agency Zone unshaded zone X, an area outside of the 100-year and 500-year flood zones. (Council Administrative Notice Item No. 35 - Docket 495 Record)
127. The proposed facility is not located within a DEEP Natural Diversity Database buffer area. (Cellco 1, Exhibit 6)

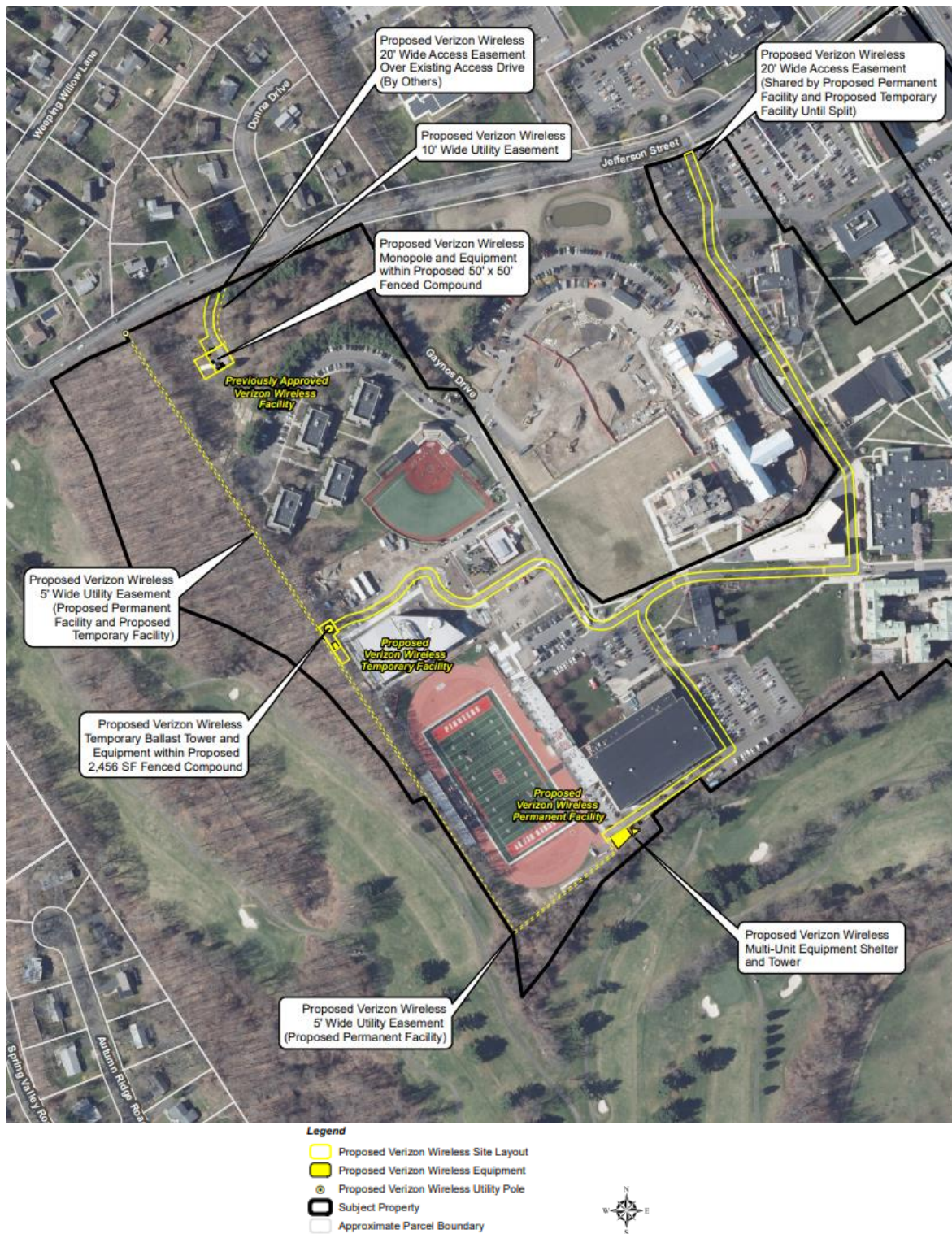
128. Installation of the telco fiber line would require the removal of 15 trees with a diameter six inches at breast height along the northwest boundary line where it traverses a wooded area. (Cellco 3, response 7; Tr. 1, pp. 21-22)
129. Connecticut is within the range of the northern long-eared bat (NLEB), a federally-listed threatened species and state-listed endangered species. There are no known NLEB hibernacula or known maternity roost trees within 0.25 miles and 150-feet, respectively, of the proposed site. Cellco consulted with the U.S. Fish and Wildlife Service and determined that the proposed facility would not have an impact on the NLEB. (Cellco 1, Exhibit 6)
130. Although voluntary measures can be taken to reduce impacts to NLEB that could occur in wooded areas, Cellco does not believe such measures are warranted for this project due to the developed nature of the surrounding area and the lack of known maternity roost trees and hibernacula. (Cellco 1, Exhibit 6; Tr. 1, pp.70-72)
131. The site is not located within a state-designated aquifer protection area. (Council Administrative Notice No. 79 - DEEP Aquifer Protection Area Maps)
132. The proposed facility is not located adjacent to an Important Bird Area (IBA), as designated by the National Audubon Society. The nearest IBA to the proposed tower site is the Devil's Den Preserve in Easton, located approximately 4.5 miles to the northwest of the site. (Council Administrative Notice Item No. 35 - Docket 495 Record)
133. The proposed facility would comply with the United States Fish and Wildlife Service guidelines for minimizing the potential for telecommunications towers to impact bird species. (Cellco 1, p. 6)
134. Rock blasting to construct the site is not anticipated. (Cellco 3, response 5)

Visibility

135. Cellco used a combination of predictive computer model, in-field analysis, and review of various data sources to evaluate the visibility of the proposed facility on both a quantitative and qualitative basis. (Cellco 1, Exhibit 4)
136. On September 14, 2021, Cellco conducted an in-field visibility analysis of the proposed tower by flying a four-foot balloon raised to a height of approximately 100 feet above ground level at the site. An in-field reconnaissance was then performed from publicly accessible locations in the surrounding area to determine where the proposed tower would be visible. (Cellco 1, Exhibit 4)
137. Information obtained during the field reconnaissance was incorporated into mapping data layers, including observations of the field reconnaissance, photo-simulation locations, areas that experienced land use changes, and places where the initial modeling was found to over- or under-predict visibility to produce a final predictive viewshed map for areas within a two-mile radius of the site (Study Area). (Cellco 1, Exhibit 4)
138. Based on the final viewshed analysis, the proposed tower would be visible year-round from approximately 25 acres (<1%) within the Study Area (refer to Figure 7A/B). The tower would be seasonally visible (leaf-off conditions) from approximately 126 acres (<1%) of the Study Area. (Cellco 1, Exhibit 4)

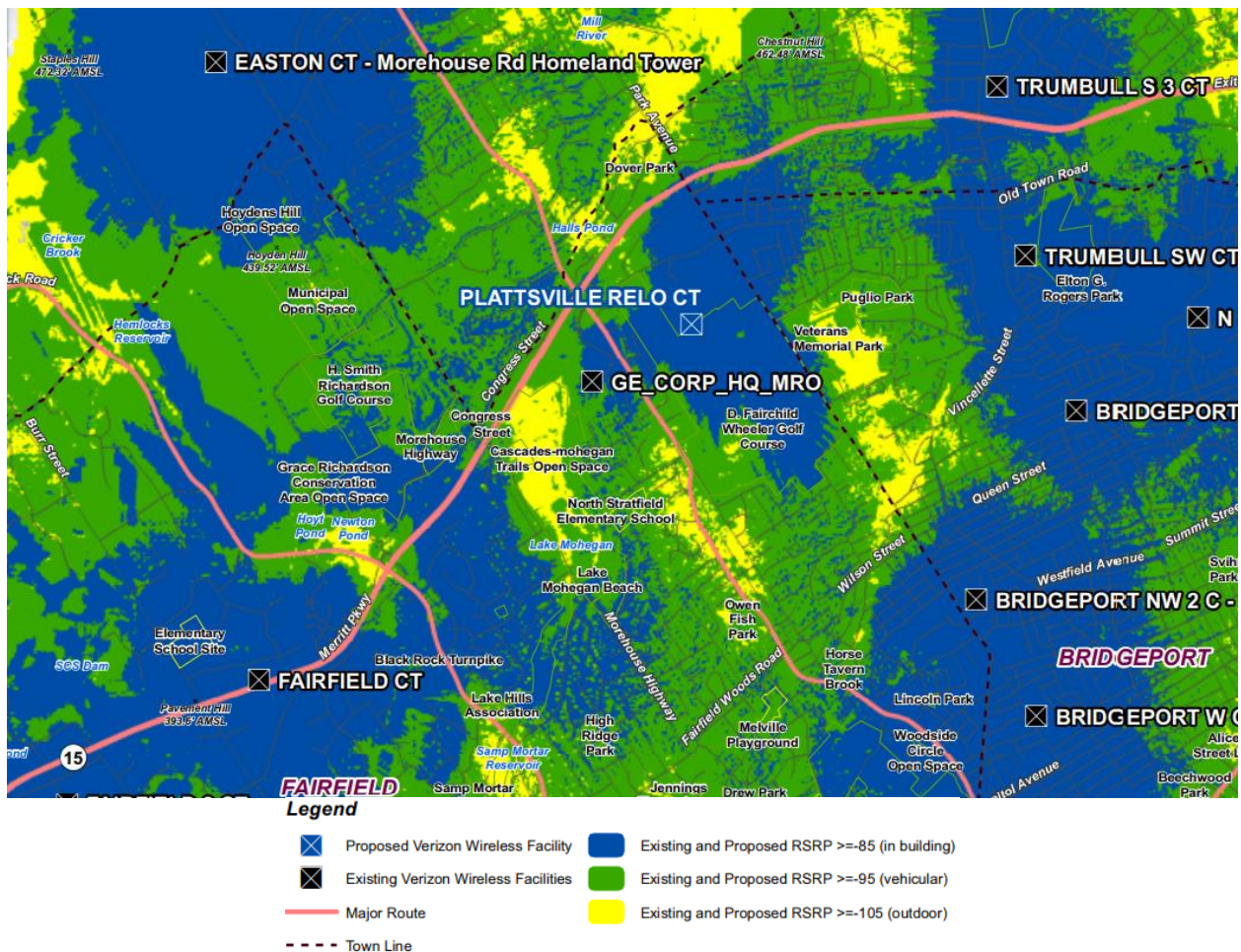
139. Generally, year-round views of the facility within an approximate 0.5-mile radius of the site would occur from SHU campus areas and the abutting Fairchild Wheeler Golf Course. In addition, some street views would occur to areas along and east of Park Avenue (including several residences). (Cellco 1, Exhibit 3; Cellco 3, response 15)
140. Seasonal views of the facility within an approximate 0.5-mile radius of the site include SHU campus areas, Fairchild Wheeler Golf Course, areas adjacent to Park Avenue and a residential area near the intersection of Easton Turnpike-Shady Brook Road – Autumn Ridge Road. (Cellco 1, Exhibit 3)
141. The residences along the east side of Autumn Ridge Road abut the Fairchild Wheeler Golf Course property. The abutting areas consist of woods and two fairways associated with the golf course further east. Beyond the golf course property is the SHU stadium with several 80-foot tall stadium light stanchions on the property line with the golf course. Views of the upper portions of the proposed tower from some residential properties would be possible through the trees in areas where existing stadium/campus infrastructure is visible. (Cellco 1, Exhibit 4; Cellco 4; Tr. 1, pp. 21, 40-41)
142. The Relocated Facility would not be visible above the tree line from Autumn Ridge Road. (Cellco 1, Exhibit 4; Cellco 4; Tr. 1, pp. 39-41)
143. Pursuant to CGS §16-50p(a)(3)(F), no public schools or commercial child day care facilities are located within 250 feet of the site. The nearest school or daycare is the Notre Dame Catholic High School (220 Jefferson Street) located approximately 0.35 mile north of the Site. The Relocated Facility would not be visible from the school. (Cellco 1, Exhibit 4)
144. The Merritt Parkway, a National Scenic Byway, is located approximately 0.5 miles northwest of the site. The Relocated Facility would not be visible from the parkway. (Cellco 1, Exhibit 4)
145. There are no “blue-blazed” hiking trails maintained by the Connecticut Forest and Park Association within one-mile of the site. (Cellco 1, Exhibit 4; Council Administrative Notice Item No. 82)
146. The site is located adjacent to a wooded area along the property boundary with the Fairchild Wheeler Golf Course. No landscaping around the Relocated Facility is proposed. (Cellco 1, Exhibit 2, Exhibit 4)
147. The design of the Relocated Facility was negotiated with SHU. SHU was not interested in a monopine or a monopole at this location. (Tr. 1, pp. 27-28)
148. The Relocated Facility was initially designed to be painted white with SHU’s logo painted in red on the fiberglass panels. Cellco, with SHU’s consent, agreed to paint the tower a light gray color so that it would blend as much as possible when viewed through intervening forested areas. (Cellco April 8, 2022 Late File Exhibit - response 1; Tr. 1, pp. 43, 92-95)

Figure 1: Location of Certificated Facility, Temporary Facility and Relocated Facility



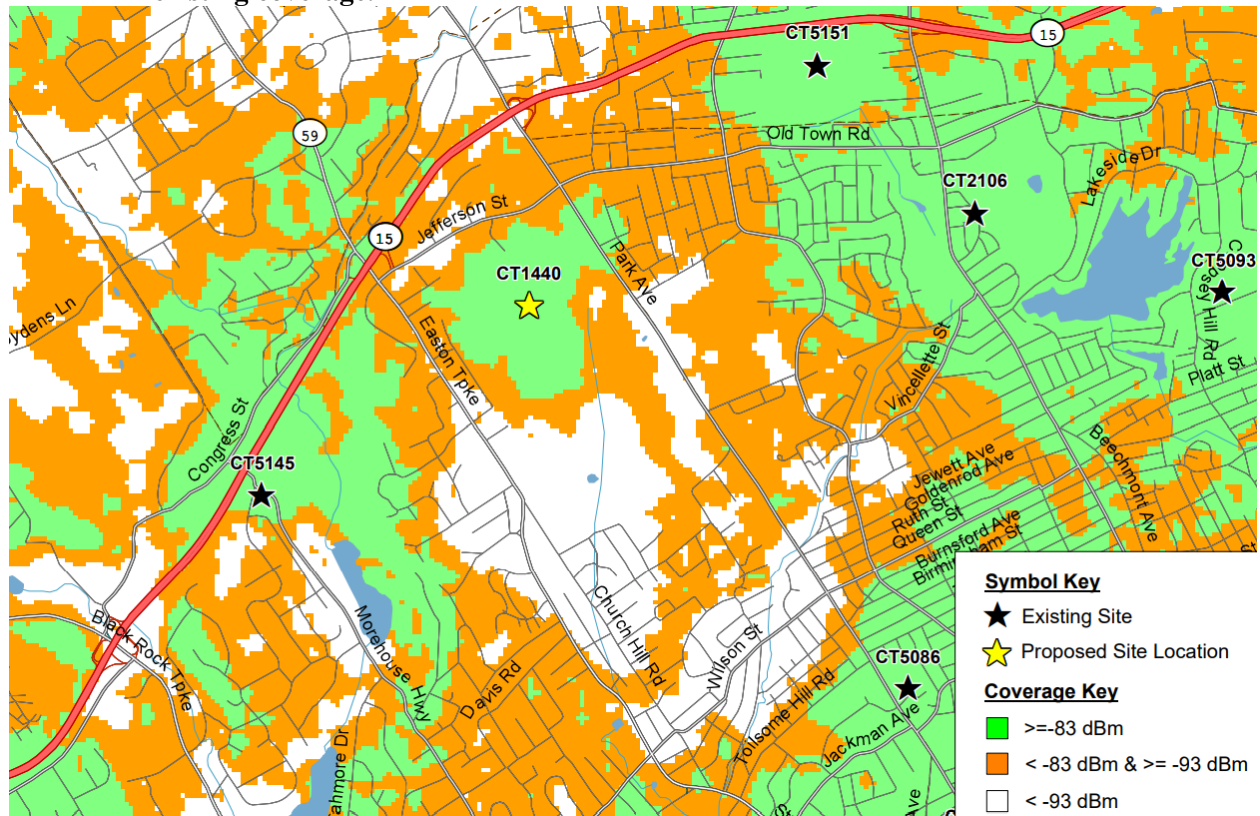
(Cellco 1, Exhibit 1)

Figure 3: Cellco proposed 700 MHz coverage from the Relocated Facility (Plattsville RELO) with existing coverage



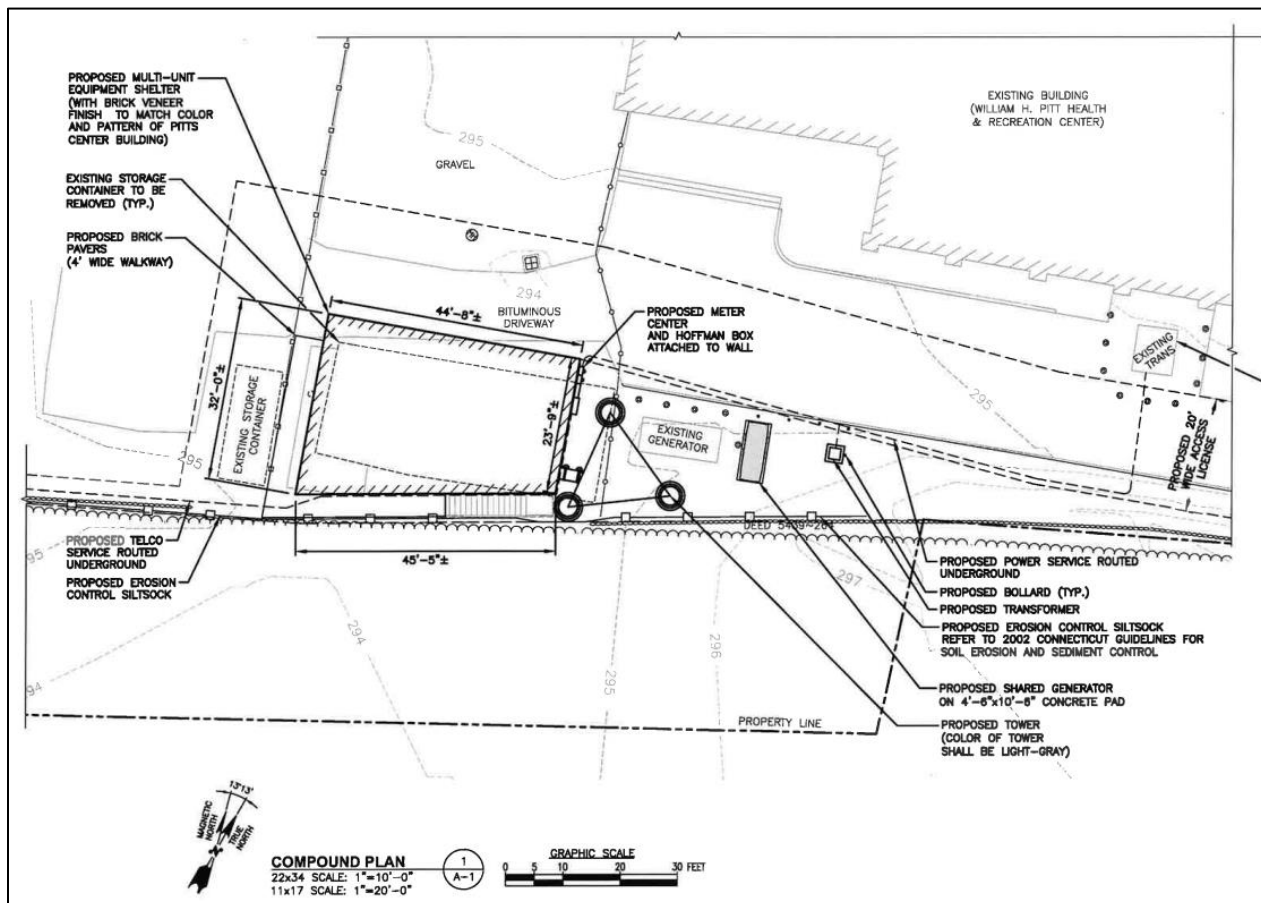
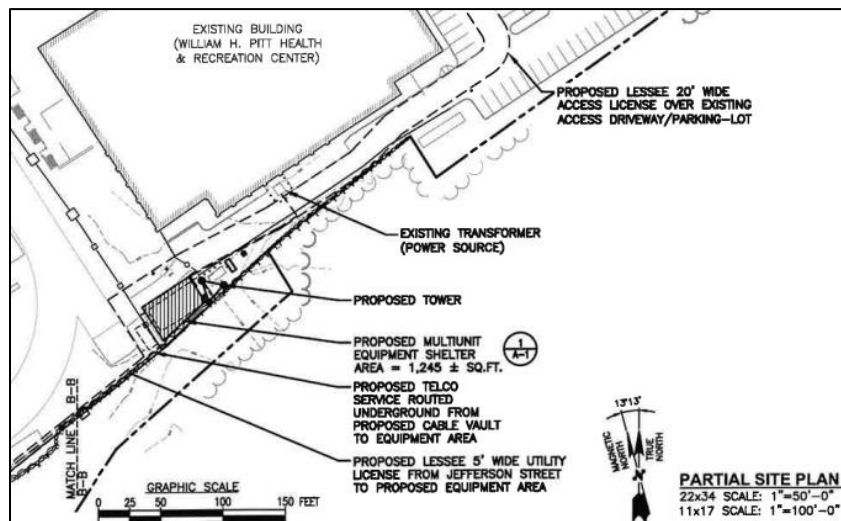
(Cellco 1, Exhibit 3)

Figure 4: AT&T Cellco proposed 700 MHz coverage from the Relocated Facility (CT1440) with existing coverage.



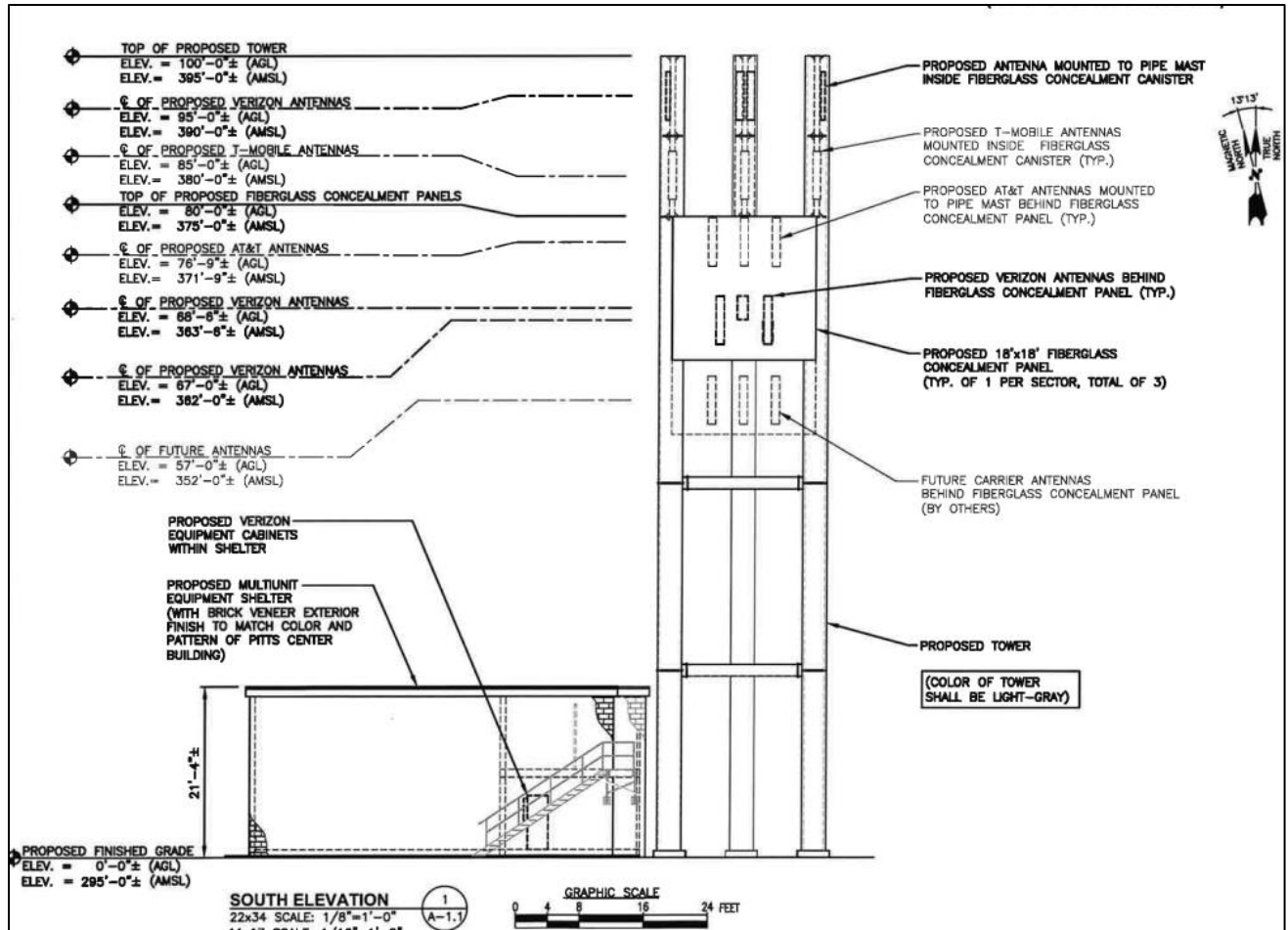
(AT&T 2, response 8)

Figure 5: Site Plan



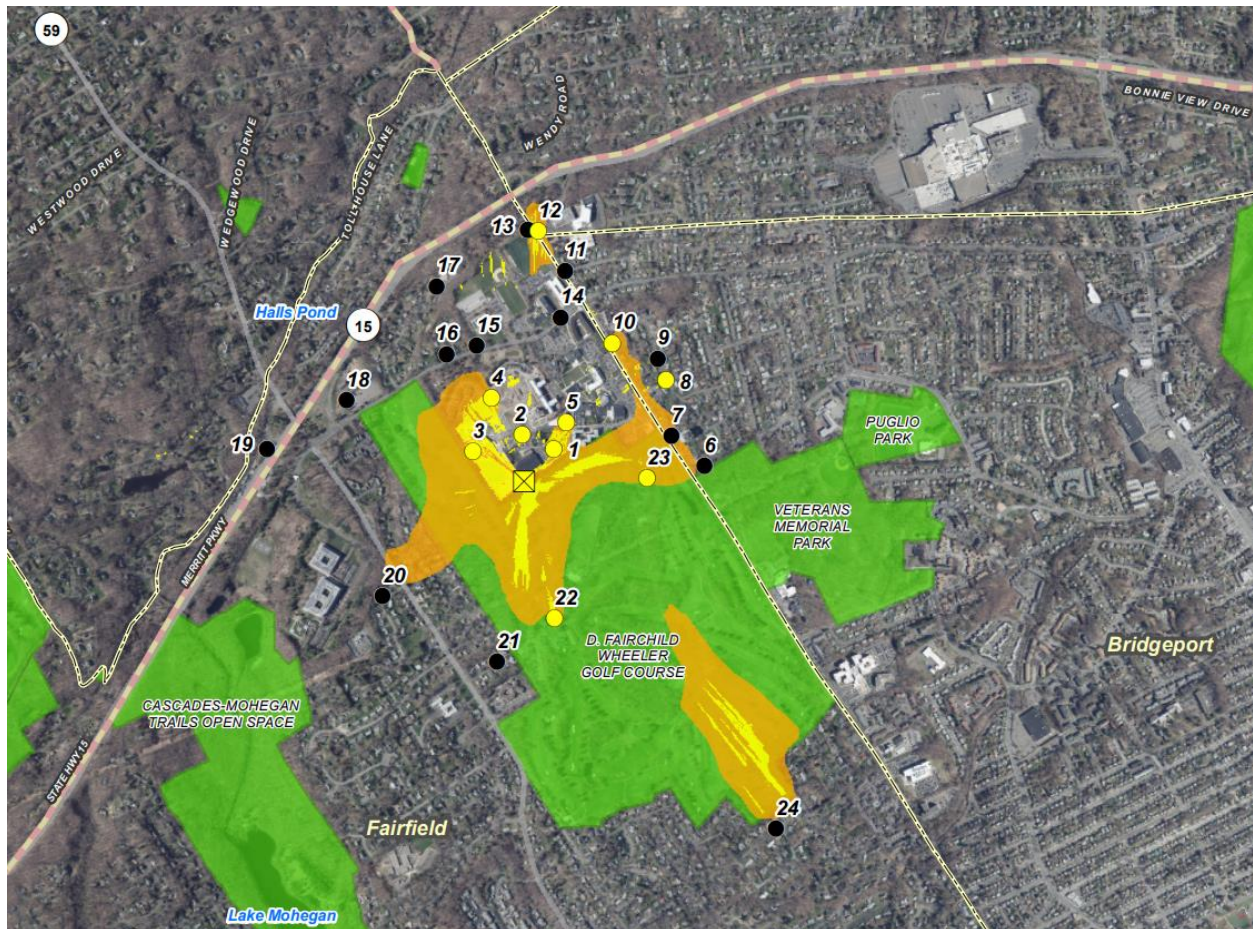
(Cellco 1, Exhibit 2)

Figure 6: Tower Elevation



(Cellco April 8, 2022 Late File – response 1)

Figure 7A: Visibility Map (partial)



Legend

Proposed Site

Study Area (2-Mile Radius)

Photo Locations (September 14, 2021)

Not Visible

Visible

Predicted Year-Round Visibility (25 Acres)

Areas of Potential Seasonal Visibility (126 Acres)

Municipal Boundary

Trail

Scenic Highway

DEEP Boat Launches

Municipal and Private Open Space Property

State Forest/Park

Protected Open Space Property

Federal

Land Trust

(Cellco 1, Exhibit 3)

Figure 7B: Visibility Map Photolog

Photo	Location	Orientation	Distance to Site	Height of Facility Visible in Photograph	Visibility
1	Sacred Heart University – Pitt Center	Southwest	\pm 0.10 Mile	50'-60'	Visible
2	Sacred Heart University – Teresa of Calcutta Hall	South	\pm 0.10 Mile	20'-30'	Visible
3	Sacred Heart University – Campus Field	Southeast	\pm 0.13 Mile	90'-100'	Visible
4	Sacred Heart University – Bobby Valentine Athletic Center	Southeast	\pm 0.20 Mile	40'-50'	Visible
5	Sacred Heart University – Bookstore	Southwest	\pm 0.16 Mile	30'-40'	Visible
6	Eckart Street	West	\pm 0.40 Mile	N/A	Not Visible
7	Park Avenue	Southwest	\pm 0.34 Mile	N/A	Not Visible
8	St. Nicholas Drive at Nancy Drive – Bridgeport	Southwest	\pm 0.38 Mile	30'-40'	Visible
9	Nancy Drive – Bridgeport*	Southwest	\pm 0.40 Mile	N/A	Not Visible
10	Park Avenue – Bridgeport	Southwest	\pm 0.36 Mile	20'-30'	Visible
11	Park Avenue – Bridgeport*	Southwest	\pm 0.47 Mile	N/A	Not Visible
12	Park Avenue – Trumbull	South	\pm 0.55 Mile	10'-20'	Visible
13	Park Avenue	South	\pm 0.55 Mile	N/A	Not Visible
14	Jefferson Street	Southwest	\pm 0.37 Mile	N/A	Not Visible
15	Jefferson Street at Entrance to Sacred Heart University	Southeast	\pm 0.31 Mile	N/A	Not Visible
16	Donna Drive at Jefferson Street	Southeast	\pm 0.33 Mile	N/A	Not Visible
17	Weeping Willow Lane	Southeast	\pm 0.47 Mile	N/A	Not Visible
18	Jefferson Street – Park & Ride	Southeast	\pm 0.43 Mile	N/A	Not Visible
19	Merritt Parkway	East	\pm 0.43 Mile	N/A	Not Visible
20	Hawthorne Drive	Northeast	\pm 0.40 Mile	N/A	Not Visible
21	Wellner Drive	North	\pm 0.40 Mile	N/A	Not Visible
22	Fairchild Wheeler Golf Course	Northwest	\pm 0.31 Mile	20'-30'	Visible
23	Fairchild Wheeler Golf Course	West	\pm 0.27 Mile	20'-30'	Visible
24	Sky Top Drive	Northwest	\pm 0.94 Mile	N/A	Not Visible

(Cellco 1, Exhibit 3)