

**DOCKET NO. 544** – Arx Wireless Infrastructure, LLC for a } Connecticut  
Certificate of Environmental Compatibility and Public Need for the }  
construction, maintenance, and operation of a telecommunications } Siting  
facility and associated equipment located at 577 West Main Street }  
(Route 82), Norwich, Connecticut } Council

May 8, 2026

## **DRAFT Findings of Fact**

### **Introduction**

1. Arx Wireless Infrastructure, LLC (Applicant) and New Cingular Wireless PCS, LLC (AT&T), in accordance with provisions of Connecticut General Statutes (CGS) §16-50g, et seq, applied to the Connecticut Siting Council (Council) on September 30, 2025 for a Certificate of Environmental Compatibility and Public Need (Certificate) for the construction, maintenance, and operation of a 135-foot monopole wireless telecommunications facility and associated equipment located at 577 West Main Street (Route 82), Norwich, Connecticut (refer to Figures 1 & 2). (Applicant 1, pp. 1-2, Exhibit R, Exhibit O; Applicant 4, response 23)
2. The Applicant is a Delaware limited liability company with an office located at 110 Washington Avenue, North Haven, Connecticut. Arx is a wireless infrastructure provider that develops new wireless facilities. Arx would construct, maintain and own the proposed facility and would be the Certificate Holder. (Applicant 1, pp. 2, 5)
3. AT&T is a Delaware limited liability company with an office at 84 Deerfield Lane, Meriden, Connecticut. AT&T is licensed by the Federal Communications Commission (FCC) to provide personal wireless communication service in the State of Connecticut. (Applicant 1, p. 5)
4. On December 23, 2025, AT&T withdrew as co-applicant in this proceeding. The Council declared AT&T to no longer be a co-applicant for this proceeding on December 24, 2025. (Record)
5. The party in this proceeding is the Applicant. The Intervenor in this proceeding is Cellco Partnership d/b/a Verizon Wireless (Cellco). (Applicant 1, p. 5; Record; Transcript 1, January 15, 2026, 2 p.m. (Tr. 1), pp. 5-6)
6. Cellco is licensed by the FCC to provide personal wireless communication service in the State of Connecticut. (Cellco 1)
7. There are no Connecticut Environmental Protection Act (CEPA) Intervenors in this proceeding. (Record)
8. Under Regulations of Connecticut State Agencies (RCSA) §16-50j-16, the Council may add parties and intervenors at any time during the pendency of a proceeding. Any person granted status is responsible for obtaining and reviewing all materials for the proceeding. (RCSA §16-50j-16 (2025))
9. The purpose of the proposed facility is to provide reliable wireless communications services for Cellco customers and address coverage and capacity deficiencies in central Norwich. (Applicant 4, responses 24-26, 29; Cellco 1, Cellco 2, responses 7-9, 14)

10. Under CGS §16-50p(b), there is a presumption of public need for personal wireless services and the Council is limited to consideration of a specific need for any proposed facility to be used to provide such services to the public. (CGS §16-50p(b) (2025))
11. Also under CGS §16-50p(b), the Council must examine whether the proposed facility may be shared with any public or private entity that provides service to the public if the shared use is technically, legally, environmentally and economically feasible and meets public safety concerns, and may impose reasonable conditions as it deems necessary to promote the immediate and shared use of telecommunications facilities and avoid the unnecessary proliferation of such facilities consistent with the state tower sharing policy. (CGS §16-50p(b) (2025); CGS §16-50aa (2025))
12. Pursuant to CGS §16-50l (b), notice of the application was provided to abutting property owners by certified mail on September 24, 2025. Five certified mail receipts were not returned. (Applicant 1, Exhibits B & D; Applicant 4, response 1, Exhibit 1)
13. On September 24, 2025, Applicant provided notice to all federal, state and local officials and agencies listed in CGS §16-50l (b). (Applicant 1, Exhibit B)
14. Pursuant to CGS §16-50l (b), Applicant provided public notice of the filing of the application that was published in The Day on September 24 and 25, 2025. (Applicant 2)

#### **Administrative Procedures**

15. CGS §1-225a permits public agencies to hold remote meetings under the Freedom of Information Act (FOIA) and the Uniform Administrative Procedure Act. FOIA defines “meeting” in relevant part as “any hearing or other proceeding of a public agency.” (CGS §1-200, *et seq.* (2025))
16. CGS §1-225a 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.(CGS §1-225a (2025))
17. Upon receipt of the application, on October 1, 2025 the Council sent a letter to the City of Norwich (City) as notification that the application was received and is being processed, in accordance with CGS §16-50gg. (Record)
18. 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 (2025))

19. During a regular Council meeting on October 30, 2025, the application was deemed complete pursuant to RCSA §16-50l-1a and the public hearing schedule was approved by the Council. (Record)
20. Pursuant to CGS §16-50m, on October 31, 2025, the Council sent a letter to the City to provide notification of the scheduled public hearing via Zoom remote conferencing and to invite the City to participate. (Record)
21. Pursuant to CGS §16-50m, the Council published legal notice of the date and time of the public hearing via Zoom remote conferencing in The Day on November 1, 2025. (Record; Tr. 1, p. 5)
22. The Council's Hearing Notice did not refer to a public field review of the proposed site. Field reviews are neither required by statute nor an integral part of the public hearing process. The purpose of a field review is an investigative tool to acquaint members of a reviewing commission with the subject property. (Record; *Manor Development Corp. v. Conservation Comm. of Simsbury*, 180 Conn. 692, 701 (1980); *Grimes v. Conservation Comm. of Litchfield*, 243 Conn. 266, 278 (1997))
23. On December 10, 2025, the Council held a 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. Applicant and Cellco participated in the Council's pre-hearing conference. Procedures for the public hearing via Zoom remote conferencing were also discussed. (Council Pre-Hearing Conference and Remote Hearing Procedure Memoranda, dated December 3, 2025)
24. On December 12, 2025, in lieu of an in-person field review of the proposed site, the Council requested that Applicant submit photographic documentation of site-specific features into the record intended to serve as a "virtual" field review of the site. On January 8, 2026, Applicant submitted such information in response to the Council's interrogatories. (Record; Applicant 4, response 48, Exhibit 48)
25. On January 7, 2026, in compliance with RCSA §16-50j-21, the Applicant installed a four-foot by six-foot sign along West Main Street in the vicinity of the access drive for the proposed site. The sign presented information regarding the proposed telecommunications facility and the Council's public hearing. (Applicant 3)
26. On January 15, 2026, pursuant to CGS §16-50o, Applicant filed a Motion for Protective Order related to the disclosure of the monthly rent and financial terms contained within the lease agreement for the proposed site. (Record)
27. Pursuant to CGS §16-50p(g), the Council shall in no way be limited by Applicant already having acquired land or an interest therein for the purpose of constructing the proposed facility. (CGS §16-50p(g) (2025); *Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007))
28. The Council's evaluation criteria under CGS §16-50p does not include the consideration of property ownership or property values nor is the Council otherwise obligated to take into account the status of property ownership or property values. (CGS §16-50p (2025); *Woodbridge Newton Neighborhood Env't Trust, et al v. Conn. Siting Council*, 2024 Conn. LEXIS 163 (2024); *Goldfisher v. Conn. Siting Council*, 95 Conn. App. 193 (2006))

29. Pursuant to CGS §16-50m, the Council gave due notice of a public hearing to be held on January 15, 2026, beginning with the evidentiary session at 2:00 p.m. and continuing with the public comment session at 6:30 p.m. via Zoom remote conferencing. The Council provided information for video/computer access or audio only telephone access. (Council's Hearing Notice dated October 31, 2025; Tr. 1, p. 1; Transcript 2 – January 15, 2026 - 6:30 p.m. [Tr. 2], p. 1)
30. During the evidentiary hearing session held on January 15, 2026, the Council issued a Protective Order related to the disclosure of the monthly rent and financial terms contained within the lease agreement for the proposed site, pursuant to CGS §1-210(b) and consistent with the Conclusions of Law adopted in Council Docket 366. (Record; Tr. 1, pp. 7-10)
31. During the evidentiary hearing session held on January 15, 2026, the Council cross examined the Applicant and Cellco. (Tr. 1)
32. The 6:30 p.m. public comment session afforded interested persons the opportunity to provide oral limited appearance statements. Interested persons were also afforded an opportunity to provide written limited appearance statements at any time up to 30 days after the close of the evidentiary record. Limited appearance statements in this proceeding, whether oral or written, were not provided under oath nor subject to cross examination. (Tr. 1, p. 7; Tr. 2, pp. 6-7; CGS §16-50n(f) (2025))
33. During the public comment session held on January 15, 2026, no members of the public made oral limited appearance statements. (Tr. 2, p.6)
34. In compliance with CGS §1-225a:
  - a) The public had the ability to view and listen to the remote public hearings in real-time, by computer, smartphone, tablet or telephone;
  - b) The remote public hearing was recorded and transcribed, and such recordings and transcripts were posted on the Council's website on January 15, and January 23, 2026;
  - c) The Hearing Notice, Hearing Program, Citizens Guide for Siting Council Procedures and Instructions for Public Access to the Remote Hearings were posted on the Council's website;
  - d) Prior to, during and after the remote public hearings, the record of the proceeding has been, and remains, available on the Council's website for public inspection; and
  - e) The Council, parties and intervenors provided their information for identification purposes during the remote public hearings.(Hearing Notice dated October 15, 2025; Tr. 1; Tr. 2; Record)
35. The purpose of discovery is to provide the Council, parties and intervenors access to all relevant information in an efficient and timely manner to ensure that a complete and accurate record is compiled. (RCSA §16-50j-22a (2025))
36. Applicant's witnesses prepared, supervised or assisted in the preparation of exhibits. The Council and Cellco were provided opportunities to cross-examine the Applicant's witness panel on the exhibits. (Record)
37. Cellco's witnesses prepared, supervised or assisted in the preparation of exhibits. The Council and Applicant were provided opportunities to cross-examine Cellco on the exhibits. (Record)
38. In an administrative proceeding, irrelevant, immaterial or unduly repetitious evidence shall be excluded, and an agency has the right to believe or disbelieve the evidence presented by any

witness, even an expert, in whole or in part. (CGS §4-178 (2025); *Dore v. Commissioner of Motor Vehicles*, 62 Conn. App. 604 (2001); RCSA §16-50j-25).

39. Pursuant to CGS §16-50n(f), at the conclusion of the public comment session held on January 15, 2026, the Council closed the evidentiary record for Docket 544 and established February 14, 2026 as the deadline for public comments and the submission of briefs and proposed findings of fact. The Council also announced that no new information, no new evidence, no arguments and no reply briefs without permission will be considered by the Council. (Record; Tr. 2, p. 10)
40. On January 16, 2026, the Council requested Applicant's consent to an extension of time to July 14, 2026 to render a final decision on the application. On January 20, 2026, in response to the Council's request, the Applicant consented to the extension of time for the Council to render a final decision. (Record; Council Close of Evidentiary Record Memorandum, dated January 16, 2026)
41. On February 12, 2026, Applicant submitted a post-hearing brief. Also on February 12, 2026, Cellco submitted a letter in lieu of post-hearing brief. (Record)
42. Constitutional principles permit an administrative agency to organize its hearing schedule so as to balance its interest in reasonable, orderly and non-repetitive proceedings against the risk of erroneous deprivation of a private interest. It is not unconstitutional for the Council, in good faith, to balance its statutory time constraints against the desire of a party, intervenor or CEPA intervenor for more time to present their objections to a proposal. (*Concerned Citizens of Sterling v. Conn. Siting Council*, 215 Conn. 474 (1990); *Pet v. Dept. of Public Health*, 228 Conn. 651 (1994); *FairwindCT, Inc. v. Conn. Siting Council*, 313 Conn. 669 (2014))

#### **Municipal Consultation**

43. Pursuant to CGS §16-50l(f), the Applicant commenced the 90-day pre-application municipal consultation process on May 9, 2025, by submitting a Technical Report regarding the proposed facility to the chief elected official of City. The Applicant conducted outreach to the City on June 2 and July 10, 2025, August 11 and 18, 2025. (Applicant 1, p. 35-36, Bulk File -Technical Report)
44. On October 22, 2025, the City Commission on the City Plan provided written comments in opposition to the proposed facility. The City expressed concerns including, but not limited to public safety, environmental and redevelopment of the host property and future development of the West Main Street area. These concerns among other public safety and environmental concerns are addressed in the Public Health and Safety and Environmental Effects and Mitigation Measures sections of this document, pursuant to CGS §16-50p. (Record)
45. On November 6, 2025, the City Mayor provided written comments in opposition to the proposed facility expressing public safety and environmental concerns. These concerns among other public safety and environmental concerns are addressed in the Public Health and Safety and Environmental Effects and Mitigation Measures sections of this document, pursuant to CGS §16-50p. (Record)

#### **State Agency Comment**

46. Pursuant to CGS §16-50j (i), on October 31, 2025, 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); State Historic Preservation Office (SHPO); and Office of Consumer Counsel (OCC). (Record)

47. No state agencies responded with comments on the application. (Record)
48. 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. (CGS §16-50p(g) (2025); *Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007)).

### **Public Need for Service**

49. 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)
50. 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. (Council Administrative Notice Item No. 4 – Telecommunications Act of 1996)
51. 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)
52. 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)
53. 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)
54. 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)

55. 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)
56. 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 (FirstNet) 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)
57. 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. 24 – FCC Wireless Infrastructure Report and Order)
58. 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. 24 – FCC Wireless Infrastructure Report and Order)
59. 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. 28 - Declaratory Ruling and Notice of Proposed Rulemaking, FCC 20-75, June 10, 2020)
60. 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. 29, Report and Order, FCC 20-153, November 3, 2020)
61. 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. (CGS §16-50aa (2025))
62. The City’s 2023 Plan of Conservation and Development states telecommunications infrastructure would enable access to digital opportunities (Applicants 1, p. 30-33).

- 63. On October 15, 2025, the Council sent correspondence to other telecommunications carriers not intervening in the proceeding requesting that carriers interested in locating on the proposed facility in the foreseeable future to notify the Council by January 8, 2026. No carriers responded to the Council’s solicitation. (Record)
- 64. The facility would be designed to accommodate four wireless carriers, including Cellco, and City and local emergency service providers. The City and local emergency service responders have not expressed an interest in collocating antennas on the proposed facility. (Applicant 1, p. 8; Tr. 1, pp. 45-46)
- 65. The height of the facility could be extended by 10 feet to accommodate collocation of Town whip antennas at the top of the tower and maintain the standard 10-foot separation between antennas. (Tr. 1, pp. 29, 41-42)

**Cellco’s Existing and Proposed Wireless Services**

- 66. Cellco has a coverage and capacity deficiency in its wireless communications network within central Norwich, specifically along Route 82 (West Main Street), Dunham Street, Pine Street, and New London Turnpike (refer to Figure 3). (Cellco 2, response 7)
- 67. Coverage deficiencies were identified through coverage mapping. Cellco’s coverage mapping shows deficiencies in the central Norwich area, including the area around the proposed facility. (Cellco 2, responses 7 and 10, Attachment 3)
- 68. Cellco currently operates three facilities 2 miles of the proposed site with which the proposed facility would interact. None of these facilities are able to provide adequate coverage to the proposed service area. These facilities are as follows:

<u>Site Name</u>	<u>Address</u>	<u>Antenna Height</u>	<u>Structure Type</u>	<u>Distance/Direction</u>
Norwich West	202 North Wawecus Hill Road, Norwich	116’	Monopole	1.4 miles northwest
Norwich 2	101 High Street, Norwich	45’	Rooftop	1 mile northeast
Mohegan Sun	1 Mohegan Sun Blvd. Uncasville	75’	Rooftop	1.8 miles southeast

(Cellco 2, response 12)

- 69. Cellco proposes to install antennas at a centerline height of 120 feet above ground level (agl) to operate 700 MHz, 850 MHz, 1900 MHz, 2100 MHz and 3700 MHz frequencies at the site. (Cellco 2, response 8)
- 70. The 3700 MHz frequency would provide 5G services. (Cellco 2, response 9)
- 71. The 700 MHz frequency handles most of Cellco’s wireless traffic and has the largest coverage footprint. Other frequencies (850 MHz, 1900 MHz, 2100 MHz, 3700 MHz) provide smaller coverage footprints and are used to provide additional capacity to the system, reducing the customer load on the 700 MHz system. (Cellco 2, response 8)

72. Cellco designs its network using a -95 dBm Reference Signal Received Power (RSRP) standard for reliable in-vehicle service and -85 dBm RSRP standard for reliable in-building service. (Cellco 2, response 10, Attachment 3)
73. Coverage mapping indicates existing service in the area is lower than -95 dBm. (Cellco 2, response 10, Attachment 3)
74. The proposed facility would provide reliable wireless service (-95 dBm) to the Norwich area as indicated in the table below:

Street Name	700 MHz	850 MHz	1900 MHz	2100 MHz	3700 MHz
Route 82 (West Main St)	0.4	0.4	0.6	0.8	0.6
Dunham St	0.3	0.4	0.4	0.6	0.4
Pine St	-	-	0.1	0.3	0.5
New London Turnpike	0.2	0.7	1.2	1.4	0.7
<b>Road Total (mi):</b>	0.8	1.6	2.3	3.1	2.2
<b>Overall Coverage Footprint (Square Miles)</b>	0.8	1.1	1.3	1.8	0.9

(refer to Figure 4) (Cellco 2, response 11)

75. The proposed facility would also provide capacity relief to Cellco’s surrounding facilities, particularly to the 700 and 850 MHz frequencies at Cellco’s Norwich West CT facility located approximately 1.4 miles northwest of the proposed site. (Cellco 2, response 13, Attachment 3)
76. An antenna centerline of 120 feet is the minimum necessary height to meet Cellco’s coverage objectives. Lowering the height of the antennas would reduce Cellco’s coverage footprint and result in coverage gaps along Route 82 (West Main Street) and surrounding areas. (Cellco 2, response 14)

**Site Selection**

77. Arx and AT&T commenced a site search in March 2023, identifying 12 potential sites. The City requested 5 of the 12 sites be investigated during municipal consultation. (Applicant 1, p2-3, Exhibit F; Applicant 4, response 4)
78. Applicant investigated 11 sites within the search area as follows:
- a) **577 West Main Street:** selected as the proposed site.
  - b) **395 West Thames Street:** owner was not interested in a lease.
  - c) **Ann Avenue:** City was initially not interested in a lease. This site was re-analyzed at the request of the City and did not meet coverage objectives
  - d) **563 West Thames Street:** owner was not interested in a lease.
  - e) **20 Lucas Street:** did not meet coverage objectives.
  - f) **660 New London Turnpike:** owner was not interested in a lease.
  - g) **390-420 West Thames Street:** did not meet coverage objectives.
  - h) **57 Salem Turnpike:** did not meet coverage objectives. This site was analyzed at the request of the City.
  - i) **15 Teachers Drive:** did not meet coverage objectives. This site was analyzed at the request of the City.

- j) **10 Westwood Pk:** did not meet coverage objectives at a height acceptable to the City. This site was analyzed at the request of the City.
  - k) **386 New London Turnpike:** did not meet coverage objectives. This site was analyzed at the request of the City.
- (Applicant 1, Exhibit F)

79. Cellco established a site search in the vicinity of the proposed facility in 2018. (Cellco 2, response 1; Cellco 3, response 1)
80. Cellco reviewed the locations identified by AT&T in its site search and determined the proposed site would meet coverage objectives. The other locations reviewed by Cellco and the reasons for their rejection are as follows:

<b>SITE LOCATION</b>	<b>RAD</b>	<b>CELLCO RF EVALUATION RESULTS</b>
<b>Off Briar Hill Rd (T-Mobile Facility)</b>	<b>70'</b>	<b>Too close to existing Norwich West Site. Too far from coverage objective.</b>
<b>202 N. Wawecus Hill Road</b>	<b>128'</b>	<b>Existing Cellco Site (Norwich West)</b>
<b>10 Laura Boulevard</b>	<b>60'</b>	<b>Too close to existing Norwich West Site. Too far from coverage objective.</b>
<b>Off Briar Hill Road</b>	<b>80'</b>	<b>Too close to existing Norwich West Site. Too far from coverage objective.</b>
<b>634 W. Main Street</b>	<b>40'</b>	<b>Due to low elevation, does not meet coverage objectives.</b>
<b>20 Lucas Street</b>	<b>156'</b>	<b>Due to low elevation and distance from search ring, does not meet coverage objectives. Too close to existing Mohegan Sun Site.</b>
<b>5 Jefferson Avenue</b>	<b>156'</b>	<b>Due to distance from search ring, does not meet coverage objectives.</b>
<b>420 West Thames Street</b>	<b>156'</b>	<b>Due to low elevation and distance from search ring, does not meet coverage objectives.</b>
<b>57 Salem Turnpike</b>	<b>120'</b>	<b>Due to intervening terrain, does not meet coverage objectives.</b>

<b>Ann Ave</b>	<b>120'</b>	<b>Coverage objectives comparable to proposed site.</b>
<b>10-15 Teachers Drive</b>	<b>120'</b>	<b>Located beyond existing Norwich 2 Site.</b>
<b>10 Westwood Drive</b>	<b>160'</b>	<b>Coverage objectives comparable to proposed site.</b>
<b>386 New London Turnpike</b>	<b>120'</b>	<b>Does not meet coverage objectives, with gaps along Duham Street, Route 82 (approximate to I-395), and along New London Turnpike.</b>

(Applicant 1, Exhibit F-Site Search Summary; Cellco 3, response 1)

81. There are no existing towers or non-tower structures within the site search area that would meet Cellco’s coverage objectives. Two rooftop sites were evaluated within the search area: 574 New London Turnpike and 401 West Thames Street. These locations were not viable due to the building height and the building owner was not interested in a lease, respectively. (Cellco 3, response 1)
82. A lease agreement between Arx and the host parcel owner was signed in June of 2024. (Applicant 1, Exhibit N)
83. Applicant collaborated with the host parcel owner to ensure the site location would not interfere with future development. (Applicant 4, response 9)
84. The Council has no authority to compel a parcel owner to sell or lease property, or portions thereof, for the purpose of siting a facility nor shall the Council be limited in any way by the applicant having already acquired land or an interest therein for the purpose of constructing a facility. (*Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007); CGS §16-50p(g)(2025))
85. For any site to be considered a feasible and prudent alternative to a proposed facility site, it must be available to host the proposed facility. The Council has no authority to force a property owner to agree to sell or lease land, or any portion thereof, as a primary or alternative location for a proposed facility. (*Corcoran v. Conn. Siting Council*, 284 Conn. 455 (2007))

***Small Cells and Distributed Antenna Systems***

86. A series of small cells or a Distributed Antenna System (DAS) to serve the area is not cost effective or feasible given the number of facilities required and encumbrances on existing utility poles such as transformers, risers, and streetlights that would limit a carrier’s ability to use the pole. While the number of small cells or DAS nodes that would be required to provide comparable service is unknown, it is expected to be a large number given the size of the service area. (Applicant 4, response 7; Cellco 2, response 2)
87. Small cell limitations include a reduction in the number of frequencies deployed, limited wireless service, existing utility equipment encumbrances and the lack of emergency backup power. (Applicant 4, response 7; Cellco 2, response 2)
88. To provide wireless service to the proposed service area would require a significant number of small cell deployments either on existing utility poles or on new utility poles along roadways or on

private parcels throughout the proposed service area and would not be economically viable as a replacement for a single tower site. The estimated cost of each small cell deployment is \$75,000 - \$80,000 depending on site-specific characteristics. (Applicant 4, response 7; Cellco 2, response 2)

### **Proposed Site**

89. 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))
90. The proposed site is located on a 0.76-acre commercial parcel owned by 577 Norwich, LLC at 577 West Main Street, Norwich. The host parcel is developed with a former car wash. (Applicant 1, p. 1)
91. The host parcel is zoned General Commercial District (GC). The surrounding area consists primarily of commercial use to the west, east and south, and residential to the north. (Applicant 1, p. 1, Exhibits G and H)
92. The proposed tower site is located at an approximate ground elevation of 118 feet above mean sea level (amsl). (Applicant 1, Exhibit G)
93. The proposed tower site is in the western portion of the host parcel behind the car wash, within an approximately 35 foot by 50 foot lease area. (refer to Figure 5). (Applicant 1, Exhibit G; Applicant 4, response 23, Exhibit 23)
94. There are 76 residential structures within 1,000 feet of the site, mostly to the west, northwest and southwest. (Applicant 1, Exhibit H; Applicant 4, response 13)
95. Development of the site, including the underground trenching for utilities, would disturb less than one acre of land (approximately 1,800 square feet). (Applicant 1, Exhibit G; Applicant 4, response 23, Exhibit 23)

### **Proposed Facility and Associated Equipment**

96. Based on Cellco's coverage objectives, the proposed facility would consist of a 125-foot monopole rather than the originally proposed 135-foot monopole based on AT&T's coverage objectives, within an 1,800 square foot irregular-shaped equipment compound with a 6-foot retaining wall along the northern and western sides of the compound. (refer to Figure 6). (Applicant 1, p. 8, Exhibit G; Applicant 4, response 23, Exhibit 23)
97. The compound is designed to accommodate four wireless carriers and City equipment. (Applicant 1, Exhibit G)
98. Cellco would install 9 panel antennas and 6 remote radio heads on an antenna platform at a centerline height of 120 feet agl. (Cellco 2, response 5)
99. Cellco would install one equipment cabinet and one battery cabinet. (Cellco 2, response 4; Cellco 3, response 4)

100. The proposed equipment compound would be surrounded by an eight-foot high chain link fence that includes a fourteen-foot wide vehicle access gate. (Applicant 1, Exhibit G)
101. Access to the tower site would be from a 20-foot wide easement originating off West Main Street across the existing paved area on the host parcel. (Applicant 1, p.2, Exhibit G)
102. Power and telecommunications utilities would extend underground within the access easement from the compound to an existing utility pole on West Main Street. (Applicant 1, Exhibit D)
103. The nearest property line from the proposed tower is a commercial parcel located approximately 24 feet to the west, at 595 West Main Street. (Applicant 4, response 13, Exhibit G; Tr. 1, p. 21-22)
104. The nearest residential structure from the proposed tower is located approximately 165 feet to the north at 78 Pine Street. (Applicant 1, Exhibit G; Tr.1, p. 13-14)
105. Property owners have no right to an unobstructed view from structures built on adjacent property except where there is an express statutory provision or there is a contract or restrictive covenant protecting the private right to a view or vista. (*Mayer v. Historic District Comm'n of Town of Groton*, 325 Conn. 765 (2017); CGS §47-25 (2025))
106. Based on a viewshed analysis, a 135-foot tower at the proposed site would be visible year-round from approximately 37.4 acres within one mile of the site generally located within the commercial/retail/mixed use areas, along West Main Street, the west end of Dunham Street and the north end of Norman Road. Seasonal visibility would occur from approximately 55.7 acres generally located within areas of forest and farmland and to the west and north of the site. (Applicant 1, Exhibit H; Applicants 4, response 46, Attachment 46)
107. Approximately 80 residences within 0.5 mile of the proposed 135-foot facility were expected to have seasonal views and an additional 18 residences were expected to have year-round views. (Applicant 4, response 46)
108. The 10-foot reduction in tower height to 125-feet agl will result in reduced visibility of the tower. (Applicant 1, Exhibit H; Applicants 4, response 46, Attachment 46; Tr. 1, pp. 24, 25)
109. The proposed monopole would have a standard galvanized steel finish. A monopine telecommunications facility at the proposed site would not blend in with the surroundings. A flagpole structure at the proposed site would not meet the carriers needs. (Applicant 1, Exhibit G; Applicant 4, response 47)
110. The estimated cost of the proposed facility is:
- |   |                         |
|---|-------------------------|
| Tower and Foundation                          | \$140,000               |
| Site Development                              | \$160,000               |
| Utility Installation                          | \$ 30,000               |
| <b><u>Applicant Total Estimated Costs</u></b> | <b><u>\$330,000</u></b> |
- (Applicant 1, p. 37)
111. Arx would recover construction costs associated with the facility by the revenue generated from leasing space on the facility to wireless service providers. (Applicant 4, response 16)

112. The estimated cost of Cellco's installation is approximately \$335,000 which would be recovered as part of its business operations and services. (Cellco 2, response 3)
113. Neither the facility, nor any portion thereof, is proposed to be undertaken by state departments, institutions or agencies or to be funded in whole or in part by the state through any grant or contract. Arx and Cellco are private entities. (Applicant 4, response 14; CGS §22a-1, *et seq.* (2025))
114. The tower would be inspected approximately every five years and after any wind or ice events as necessary. A tower inspection costs approximately \$1,500 to 2,000. (Applicant 4, response 17)

#### **Public Health and Safety**

115. 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)
116. The proposed facility would be in compliance with the requirements of the 911 Act and would provide Enhanced 911 services. (Cellco 2, response 21)
117. 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. 23 – FCC Text-to-911: Quick Facts & FAQs)
118. Cellco's proposed equipment installation would be capable of supporting text-to-911 service. (Cellco 2, response 20)
119. 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. (Council Administrative Notice No. 5 – FCC WARN Act)
120. Cellco's proposed equipment installation would provide WEA services. (Applicant 4, response 43; Cellco 2, response 22)
121. Pursuant to CGS §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. (Applicant 1, Exhibit G; Applicant 4, responses 37)
122. The tower would be designed to the Telecommunications Industry Association 222-H Structural Standards for Steel Antenna Towers and Antenna Supporting Structures. The maximum rated serviceable wind velocity for the antennas on the proposed tower is 124 mph. (Applicant 4, response 18)

123. The proposed tower would not require notice to the Federal Aviation Administration (FAA) or constitute an obstruction or hazard to air navigation and therefore would not require any obstruction marking or lighting. (Applicant 1, p. 37, Exhibit M)
124. Security measures at the site would include, but are not limited to, the proposed compound fence, a locked access gate, and removable tower pegs. (Applicant 4, response 35)
125. The design of the facility would comply with the 2022 Connecticut Fire Safety Code. (Applicant 4, response 37)
126. When necessary, facility power can be shut off manually at each carrier's meter at the main electrical meter center located outside of the compound fence. (Applicant 4, response 45)
127. Bollards would be installed to protect electrical meter and transformer equipment located outside of the compound perimeter fence. (Applicant 4, Exhibit G)
128. The tower would be designed with a yield point at 23 feet from the top of the tower to ensure the tower setback radius\* remains within the boundaries of the host parcel. \*The horizontal distance equal to the tower height that extends radially from the center of the tower. (Applicant 4, response 44, Exhibit G)
129. Operational noise from the facility would comply with state standards at the property boundaries. Noise resulting from the operation of emergency equipment is exempt from state standards. (Council Administrative Notice No. 42 - DEEP Noise Control Regulations; Applicant 4, response 42)
130. 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." (RCSA §22a-69-1.8(g) (2025))
131. No lighting is proposed for the facility. (Applicant 4, response 43)
132. The proposed facility is not within a Federal Emergency Management Agency 100-year and 500-year flood zone. (Applicant 1, p. 26, Exhibit I)
133. The site is not located within a state-designated aquifer protection area or public water supply watershed area. (Applicant 4, response 40)
134. The cumulative worst-case maximum power density from the radio frequency emissions from the operation of Cellco's antennas is 2.19 percent of the standard for the General Public/Uncontrolled Maximum Permissible Exposure, as adopted by the FCC, at a horizontal distance of approximately 50 feet from the tower using the proposed antenna configuration. These calculations are based on methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) using far-field methodology that assumes all channels would be operating simultaneously, which creates the highest possible power density levels. (Applicant 1, Exhibit J; Tr. 1, 64-65; Council Administrative Notice Item No. 2 – FCC OET Bulletin No. 65)

***Emergency Backup Power***

135. 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. 56)
136. Consistent with the findings and recommendations of the Panel, and in accordance with CGS §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. 35 – Council Docket No. 432)
137. 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. (Council Administrative Notice Item No. 35– Council Docket No. 432)
138. Cellco would utilize a battery backup to provide up to 8 hours of power in the event of a power outage. If a power outage lasts longer than 8 hours, Cellco would replace the battery. (Cellco 2, response 17; Tr. 1, pp. 27-28, 30)
139. Natural gas is available along West Main Street. Cellco does not propose to install a natural gas or diesel-fueled emergency backup generator at this site; however, it would be considered in consultation with Arx. (Tr. 1, pp. 23, 28-29, 32-34)
140. According to RCSA §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. (RCSA §22a-69-1.8 (2025))

### **Environmental Effects and Mitigation Measures**

#### *Air and Water Quality*

141. Operation of the proposed facility would not produce air emissions. (Applicant 1, p. 28)
142. 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.* (2025))
143. 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 (2025))
144. 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 (2025))

145. A wetland inspection was conducted in January 2025. No wetlands or watercourses were identified within 100 feet of the site. (Applicant 1, Exhibit K)
146. Arx would install appropriate erosion and sedimentation (E&S) controls such as hay bales and/or silt socks, consistent with the applicable *Connecticut Guidelines for Soil Erosion and Sediment Control* and the *Connecticut Stormwater Quality Manual*. (Applicant 1, Exhibit G)
147. Pursuant to CGS §22a-430b, a DEEP Stormwater Permit is required for any disturbance greater than 1 acre. The proposed site is approximately 0.76 acre, therefore construction of the facility would not require a DEEP Stormwater Permit. (Applicant 4, Exhibit 49; DEEP-WPED-GP-015)
148. The site does not require water supply or wastewater utilities. There would be no water connection to the site. (Applicant 1, p. 28; Tr. 1, pp. 22-23)

#### ***Forests and Parks***

149. There are no state parks or forests in the vicinity of the site. (Applicant 1, Exhibit H; Council Administrative Notice Item No. 83)
150. Construction of the compound area would require the removal of three trees and nine shrubs. (Applicant 1, Exhibit G; Applicant 4, response 21)

#### ***Fish, Aquaculture and Wildlife***

151. The site is not located within 100 feet of a DEEP-designated Cold Water Stream Habitat. (Council Administrative Notice Item No. 69; Applicant 1, Exhibit G)
152. DEEP Natural Diversity Database (NDDB) maps show approximate locations of state-listed endangered, threatened, and special concern species and are used to find areas of potential conservation concern. (Council Administrative Notice Item No. 79)
153. The proposed facility is not located within a DEEP NDDB buffer area. (Applicant 1, Exhibit I)
154. The U.S. Fish and Wildlife Service (USFWS) did not identify any federally-listed species that could be affected by site construction. One state endangered and proposed federal endangered species, the tricolor bat (TCB) occurs in the area. No tree clearing is recommended during the pup season for the TCB from June 1 through August 15. (Applicants 1, Exhibit I)
155. The proposed facility is not located within an Important Bird Area (IBA), as designated by the National Audubon Society. (Applicant 1, Exhibit I; Council Administrative Notice Item No. 84)
156. The proposed facility would comply with the USFWS telecommunications tower guidelines for minimizing the potential for impact to bird species. (Applicant 1, Exhibit I)
157. Applicant complied with National Environmental Policy Act (NEPA) requirements for telecommunications facilities. (Applicant 1, p. 27, Exhibit I)

#### ***Scenic, Historic and Recreational Values***

158. The Applicant performed a cultural resource screening for potential resources listed on the National Register of Historic Places or State Register of Historic Places within 0.5-mile of the proposed site.

- No such resources were identified. In accordance with NEPA requirements, the Applicant would submit a cultural resource study to SHPO for review if the proposed facility is approved. (Applicant 1, Exhibit I)
159. There are no state or local designated scenic roads within one-mile of the site. (Applicant 1, Bulk File, Exhibit H)
160. There are no Connecticut Forest and Parks Association hiking trails within one-mile of the site. (Council Administrative Notice Item No. 83; Applicant 1, Exhibit H)
161. Pursuant to CGS §16-50p(a)(3)(F), for a telecommunications proposed to be installed on land near a building containing a school, the facility will not be less than 250 feet from the building containing the school unless the location is acceptable to the chief elected official of the municipality or the Council finds that the facility will not have a substantial adverse effect on the aesthetics or scenic quality of the neighborhood in which such school is located. (CGS §16-50p(a)(3)(F) (2025))
162. No schools or commercial child day care facilities are located within 250 feet of the site. The nearest school is John B. Stanton Elementary School located approximately 0.38 miles to the north of the proposed site. The nearest commercial child day care is Kids World Childcare, LLC located approximately 1,600 feet northeast of the site. (Applicant 1, p. 23)
163. Pursuant to CGS §16-50p(b), the Council shall examine whether the proposed facility would be located in an area of the state which the Council, in consultation with DEEP and any affected municipalities, finds to be a relatively undisturbed area that possesses scenic quality of local, regional or state-wide significance and the latest facility design options intended to minimize aesthetic and environmental impacts. The Council may deny an application for a certificate if it determines that the proposed facility would substantially affect the scenic quality of its location or surrounding neighborhood and no public safety concerns require that the proposed facility be constructed in such a location. (CGS §16-50p(b) (2025))
164. No comments were received from the City, OPM or DEEP regarding any impacts to scenic quality or resources. (Record)

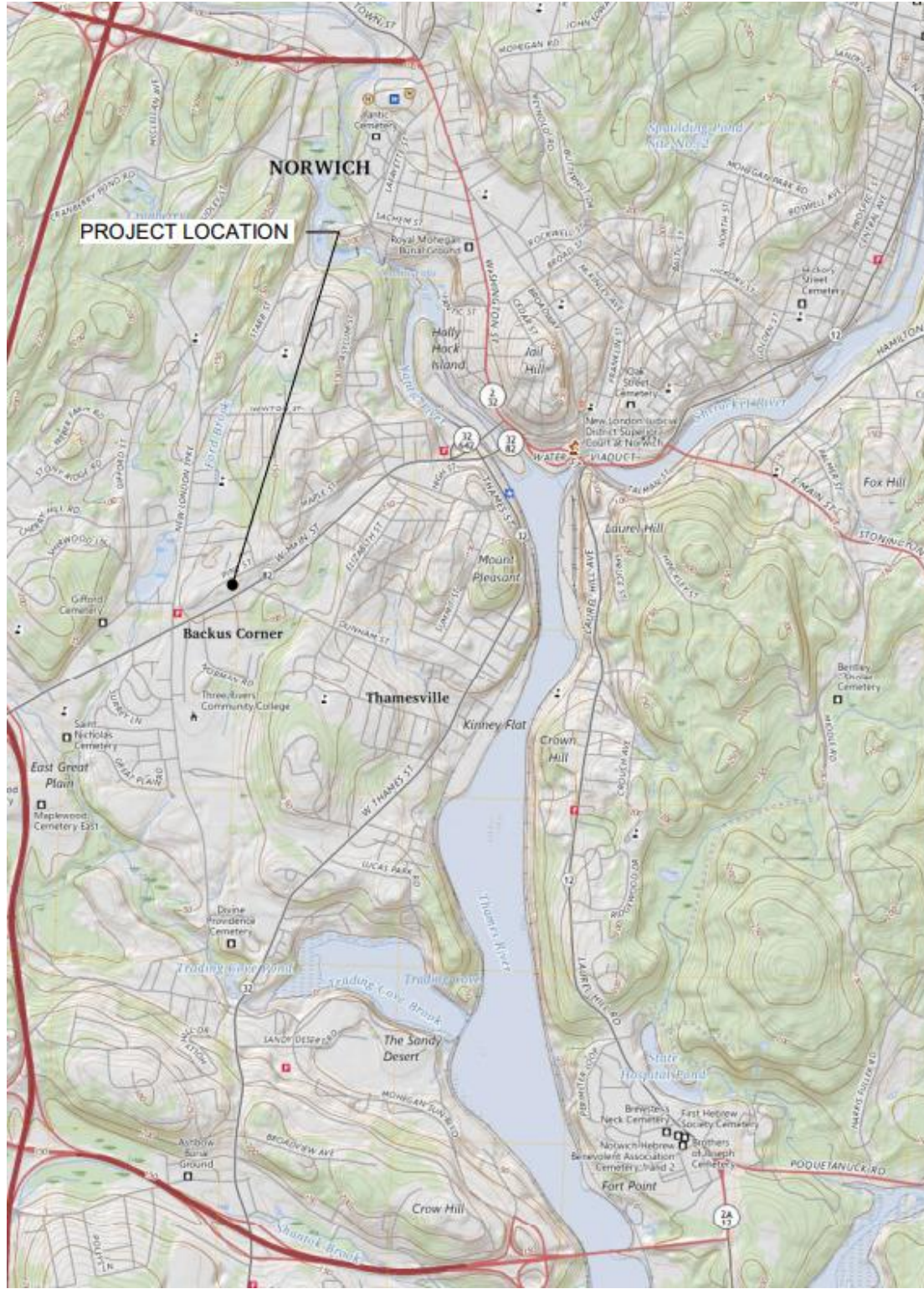
### *Agriculture*

165. Agricultural land is an economic resource. The terms “agriculture” and “farming” are defined under CGS §1-1q. Agriculture and farming activities are exempt from certain statutes and regulations, including, but not limited to, provisions related to wetlands and nuisance. (CGS §1-1q (2025); CGS §19a-341(2025)(commonly known as “the Right to Farm Law”); CGS §22a-19 (2025); CGS §22a-40 (2025); CGS §7-131d (2025); *Red Hill Coalition, Inc. v. Town Plan & Zoning Comm’n*, 212 Conn. 727 (1989); *Indian Spring Land Co. v. Inland Wetlands & Watercourse Agency of Greenwich*, 322 Conn. 1 (2016))
166. The host parcel does not contain farmland soils. (Applicant 1, Exhibit I)
167. Soils at the site consist of urban land. (Applicant 1, Exhibit I)

### **Facility Construction**

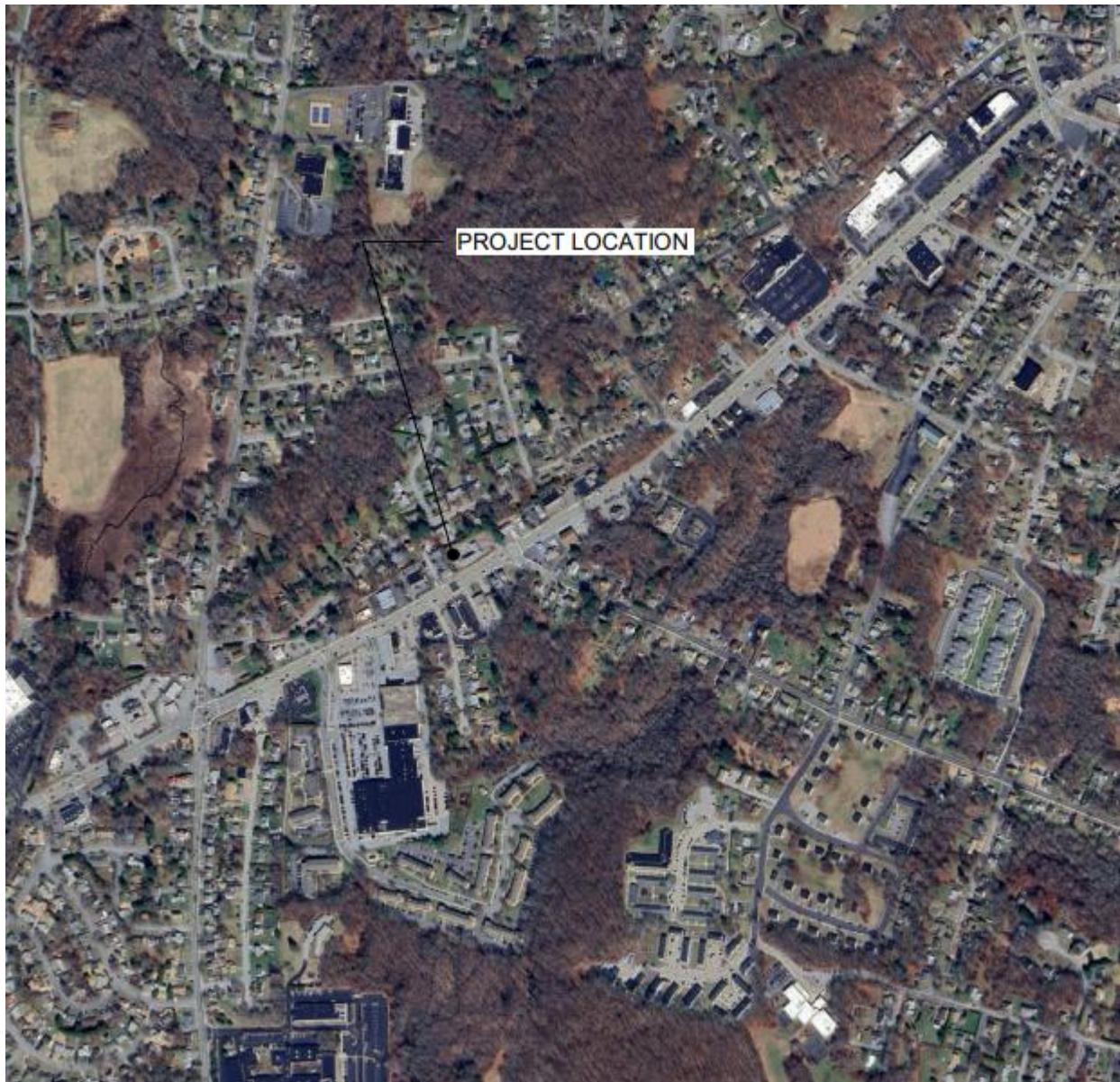
168. A geotechnical survey would be conducted prior to construction to evaluate existing subsurface conditions for the design of the tower foundation. The foundation design would be included within the Development & Management (D&M) Plan for the facility. (Applicant 4, response 9)
169. A D&M Plan is a condition of a Council final decision that must be met prior to commencement of construction and constitutes the “nuts and bolts” of a facility approved by the Council. (CGS §16-50p (2025); RCSA §16-50j-75, *et seq.*; *Woodbridge Newton Neighborhood Env’t Trust, et al v. Conn. Siting Council*, 2024 Conn. LEXIS 163 (2024))
170. A copy or notice of the filing of a D&M Plan with the Council is required to be provided to the service list for comment. (RCSA §16-50j-75(e)(2025))
171. The Council has statutory authority to order a D&M Plan and the Council’s D&M Plan process has been upheld by the Connecticut Supreme Court. (CGS §16-50p (2025); *FairwindCT, Inc. v. Conn. Siting Council*, 313 Conn. 669 (2014)).
172. Testing and disposal of material removed from the site will follow Best Management Practices. (Applicant 4, response 12; Tr.1, p. 21)
173. Construction would require approximately 120 cubic yards of excavation. (Applicant 1, Exhibit G)
174. Site construction would commence following Council approval of the D&M Plan for the facility. (Applicant 1, p. 38)
175. The facility would be constructed over a 15-week period, followed by 2 weeks of cell site integration and system testing. (Applicant 1, p. 38)
176. Construction hours would be 8:00 a.m. – 4:30 p.m., Monday through Friday. (Applicant 4, response 19)

**Figure 1 – Site Location – Topographic Map**



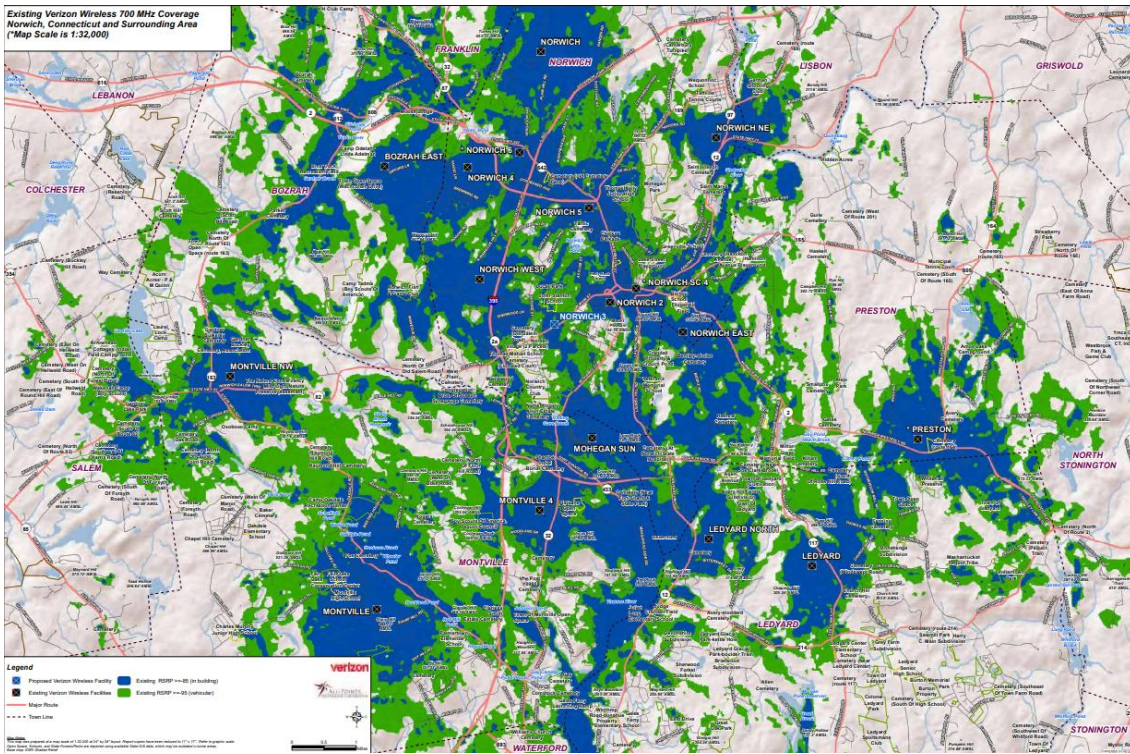
(Applicant 1, Exhibit R)

**Figure 2 – Site Location – Aerial Photograph**

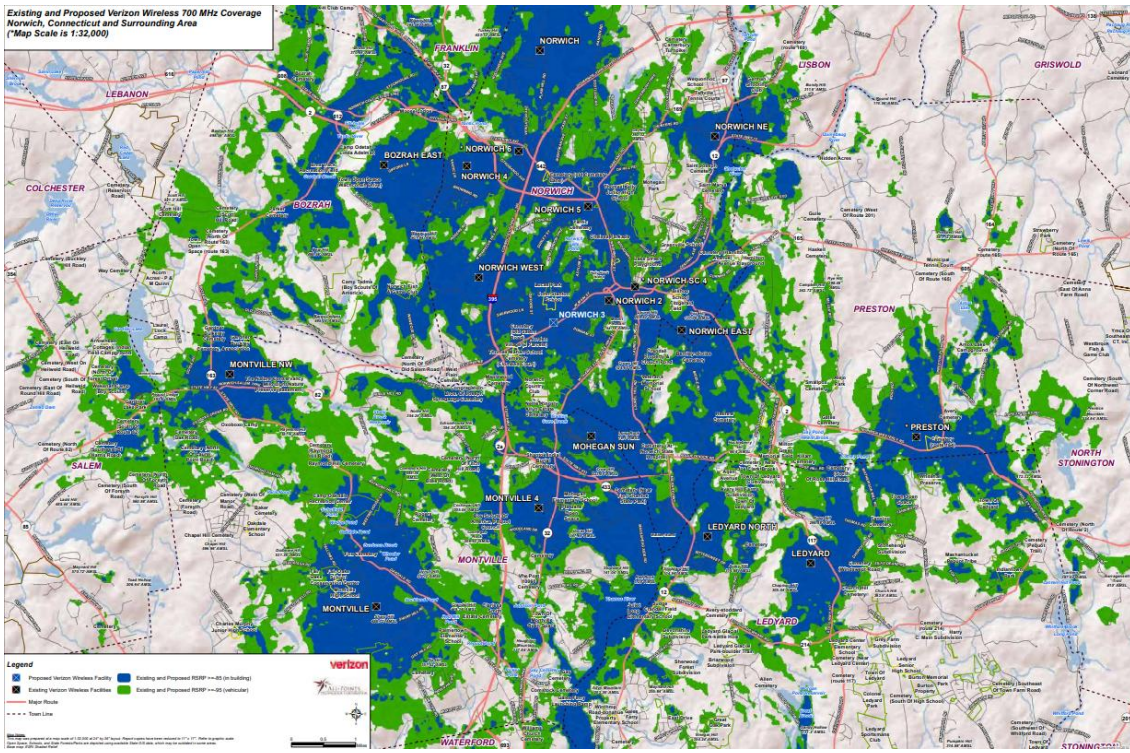


(Applicant 1, Exhibit O)

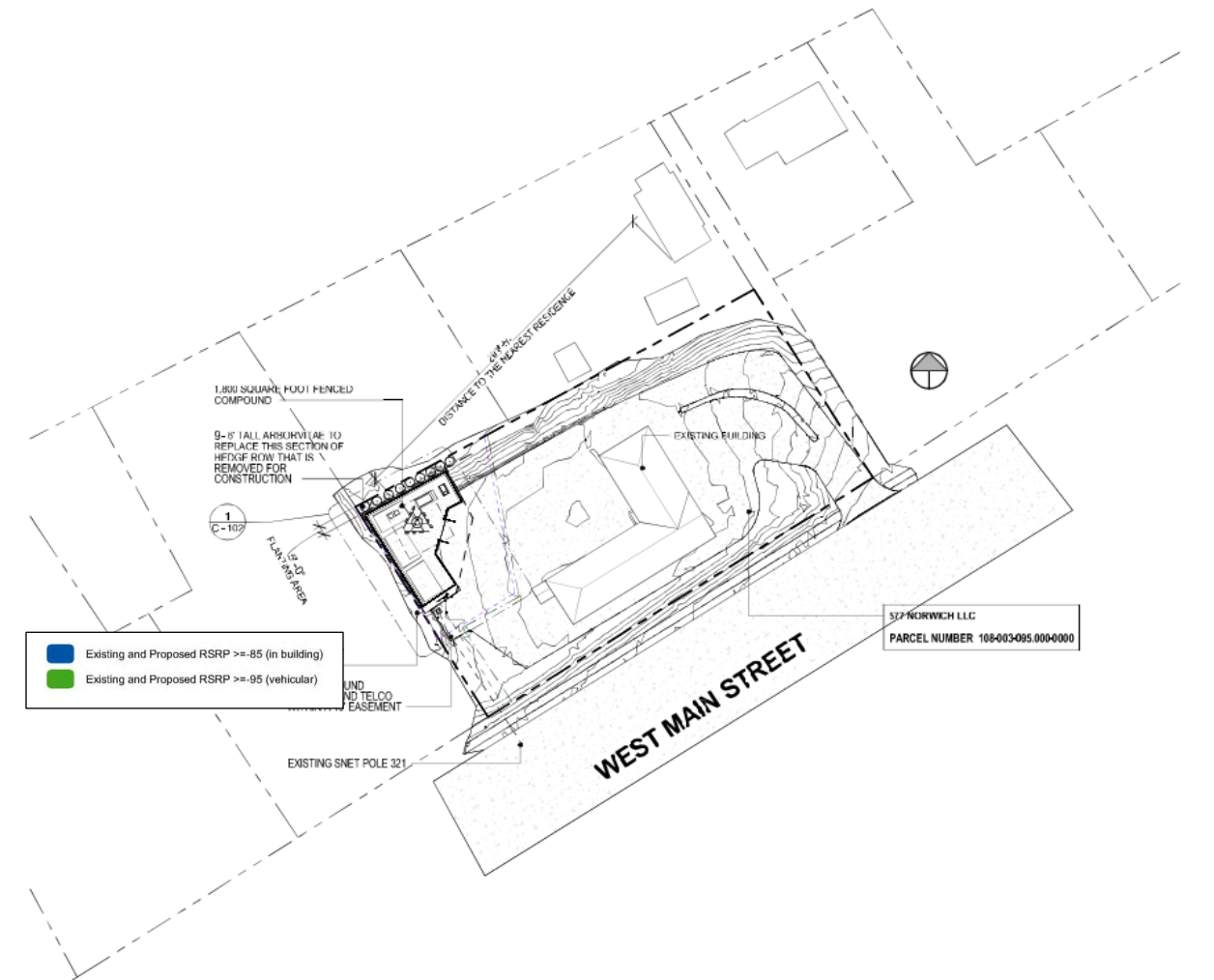
**Figure 3– Cellco Existing 700 MHz Coverage**



**Figure 4 – Cellco Existing and Proposed 700 MHz Coverage**

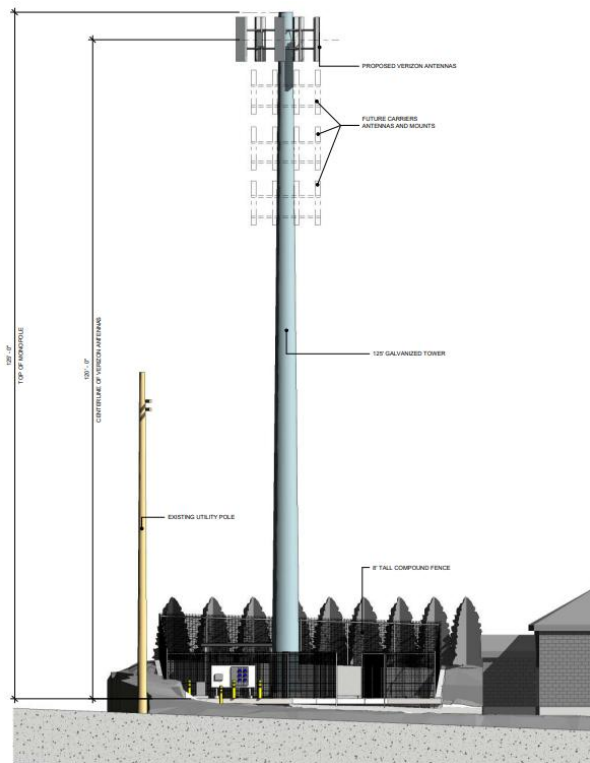
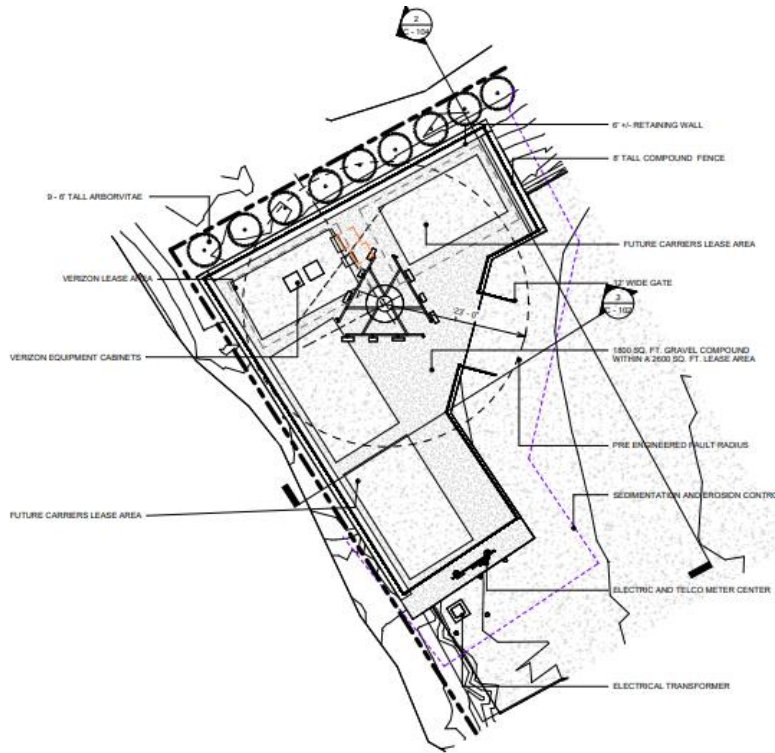


**Figure 5 –Site Plan Overview**



(Applicant 1, Exhibit G)

**Figure 6 – Site Plan - compound and tower detail**



**Figure 7 – Proposed 135-foot Tower Site Visibility Analysis Map and Photolog**

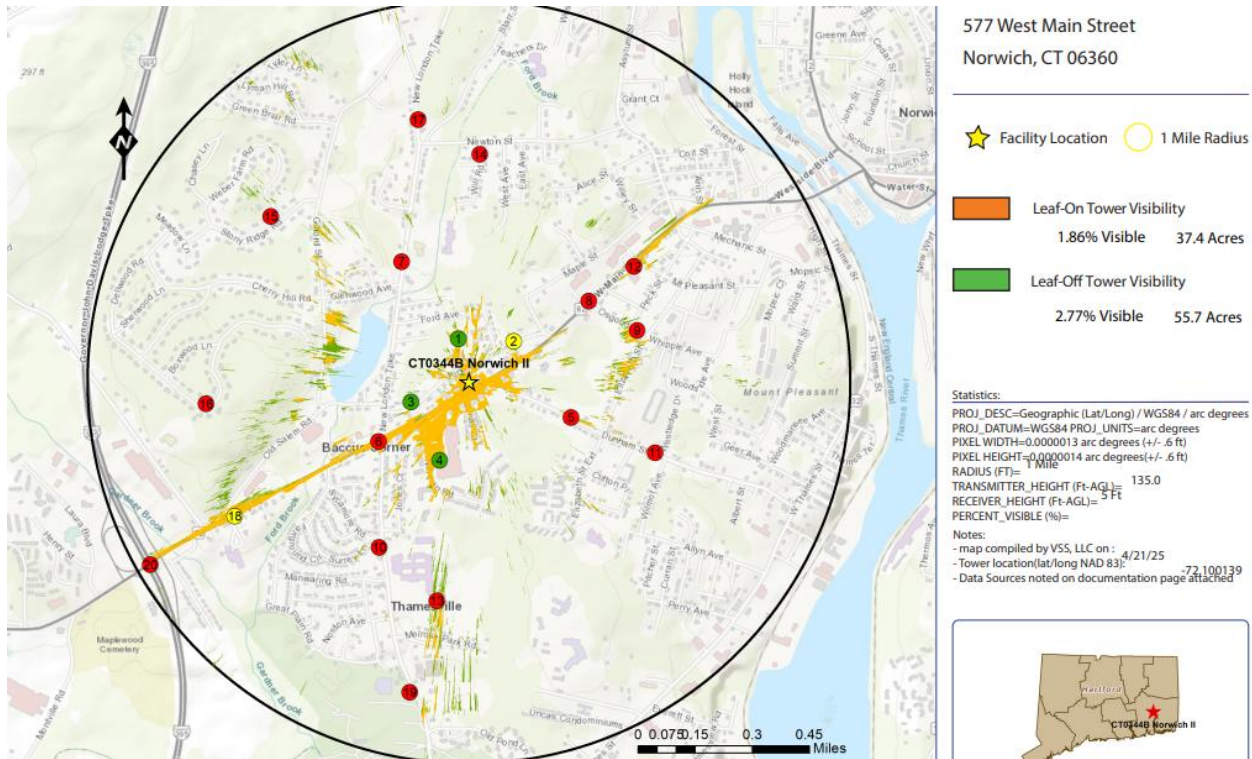


Image No	Address	Distance from Tower	Visibility	Approximate amount of tower visible (ft)
1	20 Pinecrest Ct	0.12 Miles	Year Round	65
2	14 Pine St	0.16 Miles	Obscured	15
3	79 Pine St	0.16 Miles	Year Round	35
4	624 W Main St	0.22 Miles	Year Round	65
5	211 Dunham St	0.28 Miles	Not Visible	NA
6	507 New London Turnpike	0.28 Miles	Not Visible	NA
7	397 New London Turnpike	0.36 Miles	Not Visible	NA
8	454 CT-82	0.38 Miles	Not Visible	NA
9	106 Peck St	0.46 Miles	Not Visible	NA
10	563 New London Turnpike	0.49 Miles	Not Visible	NA
11	159 Dunham St	0.52 Miles	Not Visible	NA
12	382 W Main St	0.53 Miles	Not Visible	NA
13	Three Rivers Community College/Clock Tower (CTDOT)	0.58 Miles	Not Visible	NA
14	8 Will Rd	0.6 Miles	Not Visible	NA
15	6 Weber Farm Rd	0.68 Miles	Not Visible	NA
16	64 Sherwood Ln	0.69 Miles	Not Visible	NA
17	327 New London Turnpike	0.7 Miles	Not Visible	NA
18	90 Salem Turnpike	0.71 Miles	Obscured	15
19	NL Tpk/Malerba's Farm	0.83 Miles	Not Visible	NA
20	167 Salem Turnpike	0.96 Miles	Not Visible	NA

(Applicant 1, Exhibit H)