



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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

E-Mail: siting.council@po.state.ct.us

Web Site: www.state.ct.us/csc/index.htm

September 6, 2002

Christopher B. Fisher, Esq.
Cuddy & Feder & Worby LLP
90 Maple Avenue
White Plains, NY 10601-5196

RE: EM-AT&T-003-020808 - AT&T Wireless PCS, LLC d/b/a AT&T Wireless notice of intent to modify an existing telecommunications facility located at 20 Seles Road, Ashford, Connecticut.

Dear Attorney Fisher:

At a public meeting held on September 5, 2002, the Connecticut Siting Council (Council) acknowledged your notice to modify this existing telecommunications facility, pursuant to Section 16-50j-73 of the Regulations of Connecticut State Agencies.

The proposed modifications are to be implemented as specified here and in your notice received in our office on August 8, 2002. The modifications are in compliance with the exception criteria in Section 16-50j-72 (b) of the Regulations of Connecticut State Agencies as changes to an existing facility site that would not increase tower height, extend the boundaries of the tower site, increase noise levels at the tower site boundary by six decibels, and increase the total radio frequencies electromagnetic radiation power density measured at the tower site boundary to or above the standard adopted by the State Department of Environmental Protection pursuant to General Statutes § 22a-162. This facility has also been carefully modeled to ensure that radio frequency emissions are conservatively below State and federal standards applicable to the frequencies now used on this tower.

This decision is under the exclusive jurisdiction of the Council. Any additional change to this facility will require explicit notice to this agency pursuant to Regulations of Connecticut State Agencies Section 16-50j-73. Such notice shall include all relevant information regarding the proposed change with cumulative worst-case modeling of radio frequency exposure at the closest point of uncontrolled access to the tower base, consistent with Federal Communications Commission, Office of Engineering and Technology, Bulletin 65. Any deviation from this format may result in the Council implementing enforcement proceedings pursuant to General Statutes § 16-50u including, without limitation, imposition of expenses resulting from such failure and of civil penalties in an amount not less than one thousand dollars per day for each day of construction or operation in material violation.

Thank you for your attention and cooperation.

Very truly yours,


Mortimer A. Gelston
Chairman

MAG/laf

c: Honorable John M. Zulick, First Selectman, Town of Ashford
Stephen Lowry, Zoning Enforcement Officer, Town of Ashford
Raymond and Kathy Baker
Thomas F. Flynn III, Nextel Communications
Michele G. Briggs, Southwestern Bell Mobile System, LLC
Julie M. Donaldson, Esq., Hurwitz & Sagarin LLC
Sandy M. Carter, Verizon Wireless

RECEIVED

AUG - 8 2002

**NOTICE OF INTENT TO MODIFY AN
EXISTING TELECOMMUNICATIONS FACILITY AT
20 SELES ROAD, ASHFORD, CONNECTICUT
CONNECTICUT
SITING COUNCIL**

Pursuant to the Public Utility Environmental Standards Act, Connecticut General Statutes § 16-50g et. seq. ("PUESA"), and Sections 16-50j-72(b) of the Regulations of Connecticut State Agencies adopted pursuant to the PUESA, AT&T Wireless PCS, LLC d/b/a AT&T Wireless ("AT&T Wireless") hereby notifies the Connecticut Siting Council of its intent to modify an existing facility located at 20 Seles Road, Ashford, Connecticut (the "Seles Road Facility"), owned by Raymond and Kathy Baker (the "tower owner"). AT&T Wireless and the tower owner have agreed to share the use of the Seles Road Facility, as detailed below.

The Seles Road Facility

The Seles Road Facility consists of an approximately one hundred ninety (190) foot guyed lattice tower (the "Tower") and associated equipment currently being used and/or reserved for future use for wireless communications by Nextel, Cingular (SNET), Sprint and Verizon. The Facility is buffered by vegetation.

AT&T Wireless' Facility

As shown on the enclosed plans prepared by URS Corporation, including a site plan and tower elevation of the Seles Road Facility, AT&T Wireless proposes shared use of the Facility by placing antennas on the Tower and equipment cabinets at grade needed to provide personal communications services ("PCS"). AT&T Wireless will install 6 panel antennas at approximately the 140 foot level of the Tower and associated equipment cabinets (2 proposed, 2 future, each 76"H x 30" W x 30" D) located on a concrete pad. As evidenced in the structural report prepared by Fred A. Nudd Corporation, annexed hereto as Exhibit A, AT&T has confirmed that the Tower is structurally capable of supporting the addition of AT&T Wireless' antennas.

AT&T Wireless' Facility Constitutes An Exempt Modification

The proposed addition of AT&T Wireless' antennas and equipment to the Seles Road Facility constitutes an exempt "modification" of an existing facility as defined in Connecticut General Statutes Section 16-50i(d) and Council regulations promulgated pursuant thereto. Addition of AT&T Wireless' antennas and equipment to the Tower will not result in an increase of the Tower's height nor extend the site boundaries. Further, there will be no increase in noise levels by six (6) decibels or more at the Tower site's boundary. As set forth in an Emissions Report prepared by Satish Bhandare, RF Engineer, annexed hereto as Exhibit B, the total radio frequency electromagnetic radiation power density at the Tower site's boundary will not be increased to or above the standard adopted by the Connecticut Department of Environmental Protection as set forth in Section 22a-162 of the Connecticut General

Statutes and MPE limits established by the Federal Communications Commission. For all the foregoing reasons, addition of AT&T Wireless' facility to the Tower constitutes an exempt modification which will not have a substantially adverse environmental effect.

Conclusion

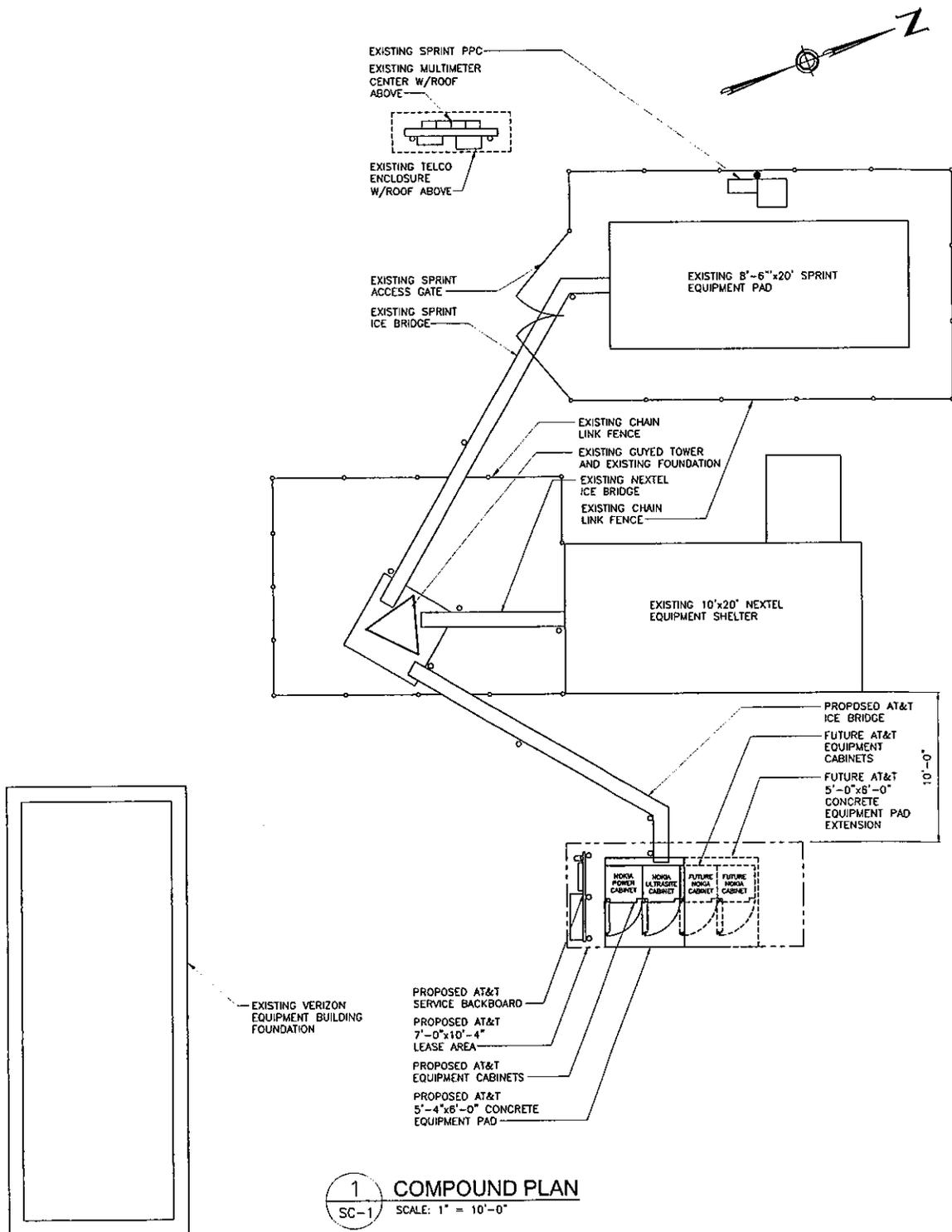
Accordingly, AT&T Wireless requests that the Connecticut Siting Council acknowledge that its proposed modification to the Seles Road Facility meets the Council's exemption criteria.

Respectfully Submitted,



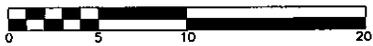
Christopher B. Fisher, Esq.
On behalf of AT&T Wireless

cc: First Selectman, Town of Ashford
RJ Wetzel, Bechtel



1
SC-1

COMPOUND PLAN
SCALE: 1" = 10'-0"



SITING COUNCIL REVIEW

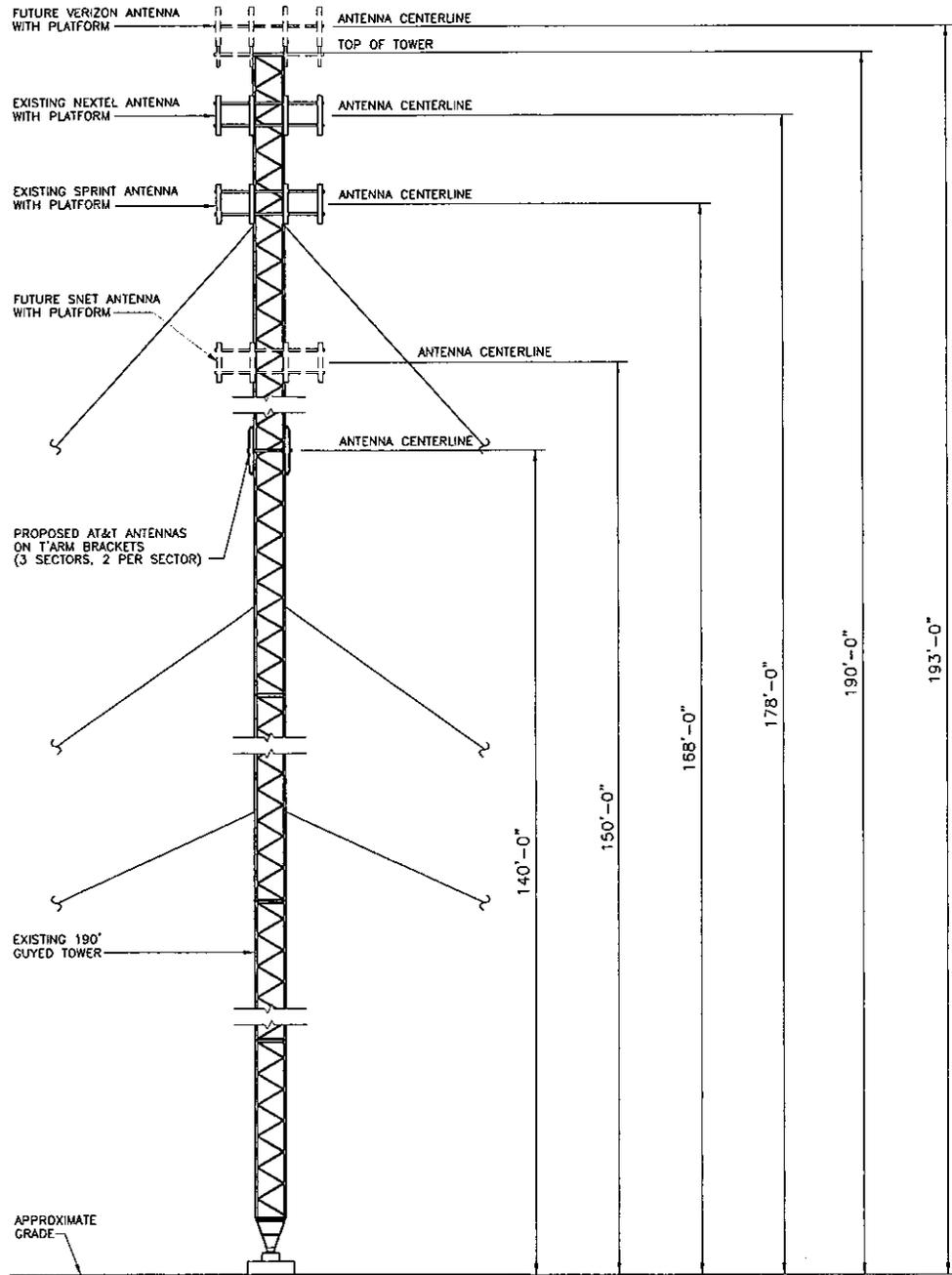
LATITUDE:	41.8634 (NAD 83)
LONGITUDE:	72.1828 (NAD 83)

URS
URS CORPORATION-AES
795 BROOK STREET, BLDG 5
ROCKY HILL, CT. 06067
1-(860)-529-8882
1-(860)-529-5566 (FAX)

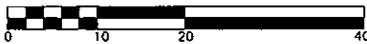
 **AT&T**
AT&T WIRELESS PCS LLC
12 OMEGA DRIVE
STAMFORD, CONNECTICUT 06902

DRAWING TITLE: COMPOUND PLAN
PROJECT INFORMATION:
ASHFORD WEST
CT-701
20 SELES ROAD
ASHFORD, CONNECTICUT
PROPERTY OWNER:
RAYMOND AND KATHY BAKER
20 SELES ROAD
ASHFORD, CONNECTICUT

DRAWING TITLE: 907-009-701A-SC1	
REVISION NO. A	DRAWN BY: RB
DATE ISSUED: 07/11/02	CHECKED BY: JCF
SCALE: AS NOTED	APPROVED BY:
	SHEET NO. 1 OF 2
URS JOB NO.: F302224.36	



1 TOWER ELEVATION
 SC-2 SCALE: 1" = 20'-0"



SITING COUNCIL REVIEW

LATITUDE: 41.8634 (NAD 83)
 LONGITUDE: 72.1828 (NAD 83)



URS CORPORATION-AES
 795 BROOK STREET, BLDG 5
 ROCKY HILL, CT. 06067
 1-(860)-529-8882
 1-(860)-529-5566 (FAX)



AT&T

AT&T WIRELESS PCS LLC
 12 OMEGA DRIVE
 STAMFORD, CONNECTICUT 06902

DRAWING TITLE: TOWER ELEVATION

PROJECT INFORMATION:
 ASHFORD WEST
 CT-701
 20 SELES ROAD
 ASHFORD, CONNECTICUT

PROPERTY OWNER:
 RAYMOND AND KATHY BAKER
 22 SELES ROAD
 ASHFORD, CONNECTICUT

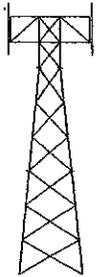
DRAWING TITLE:
 907-009-701A-SC2

REVISION NO. A	DRAWN BY: RB
DATE ISSUED: 07/11/02	CHECKED BY: JCF
SCALE: AS NOTED	APPROVED BY:
	SHEET NO. 2 OF 2
URS JOB NO.: F301924.35	



FRED A. NUDD CORPORATION

1743 ROUTE 104, BOX 577
ONTARIO, NY 14519
(315) 524-2531 FAX (315) 524-4249
www.nuddtowers.com



Analysis of
190' Guyed Tower

MODEL #: G42WPAR

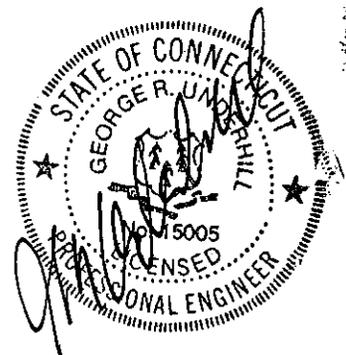
PROJECT #: 9109

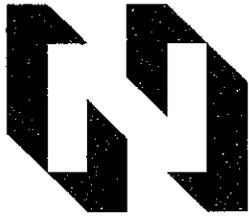
LOCATION: Ashford, CT

for

CDT
Box 363
17 Ridgewood Dr.
Marlborough, CT 06447

July, 2002

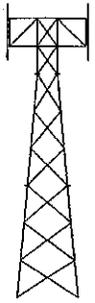




FRED A. NUDD CORPORATION

1743 ROUTE 104, BOX 577
ONTARIO, NY 14519
(315) 524-2531 FAX (315) 524-4249

www.nuddtowers.com



July 2, 2002

Bob Francis
Cordless Data Transfer
P.O. Box 363
Marlborough, CT 06447

Bob,

We have completed the analysis of your Ashford, CT tower and have found it adequate within the scope of this analysis to support the proposed antenna loading. The analysis was performed using 85 mph wind speed with 1/2" radial ice per EIA/TIA 222-F recommended standard.

The tower we analyzed is a 190' Nudd G42WPAR guyed tower consisting of pipe legs and angle/rod bracing. Tower sections are all-welded with a face dimension of 42". Foundation capacities were predicated on original design criteria.

The antenna loading used in the analysis consisted of the configuration shown on drawing 02-9109-1. The results of the analysis showed all tower and foundation elements to be loaded within allowable limits.

If you have any questions concerning this analysis, please contact me.

Sincerely,

FRED A. NUDD CORPORATION

Patrick Botimer
Engineer



**RF Exposure Analysis for Proposed
AT&T Wireless Antenna Facility**

SITE ID: 907-009-701

June 26, 2002

**Prepared by AT&T Wireless Services, Inc.
Satish Bhandare, RF Engineer**

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1. Introduction

This report constitutes an RF exposure analysis for the proposed AT&T Wireless antenna facility to be located at 190 West Old Route 6, Hampton, CT. This analysis uses site-specific engineering data to determine the predicted levels of radio frequency (RF) electromagnetic energy in the vicinity of the proposed facility and compares those levels with the Maximum Permissible Exposure (MPE) limits established by the Federal Communications Commission.

2. Site Data

Site Name: <i>Preston Central</i>	
Number of simultaneously operating channels	12
Type of antenna	Allgon 7250.03
Power per channel (Watts ERP)	250.0 Watts
Height of antenna (feet AGL)	140 feet
Antenna Aperture Length	5 feet

3. RF Exposure Prediction

The following equations established by the FCC, in conjunction with the site data, were used to determine the levels of RF electromagnetic energy present in the vicinity of the proposed facility¹:

$$PowerDensity = \frac{0.64 * 1.64 * N * ERP(\theta)}{\pi * R^2} (mW/cm^2) \qquad Eq. 1-Far-field$$

Where, *N*= Number of channels, *R*= distance in cm from the RC (Radiation Center) of antenna, and *ERP*(θ) = The power of a half wave dipole expressed in milliwatts in the direction of prediction point. This is the correct equation for antennas which have their gain expressed in dBd.

$$PowerDensity = \frac{P_{in} / ch * N * 10^3}{2 * \pi * R * h * \alpha / 360} (mW/cm^2) \qquad Eq. 2-Near-field$$

Where *P_{in}/ch* = Input power to antenna terminals in watts/ch, *R* = distance to center of radiation, *h* = aperture height in meters, α = 3 dB beam-width of horizontal pattern.

¹ RF exposure is measured and predicted in terms of power density in units of milliwatts (mW), a thousandth of a watt, or microwatts (μ W), a millionth of a watt, per square centimeter (cm²). Data comparing predictive analysis with on site measurements has demonstrated that power density can be effectively predicted at given locations in the vicinity of a wireless antenna facility.

4. FCC Guidelines for Evaluating the Environmental Effects of RF Radiation

In 1985, the FCC established rules to regulate radio frequency (RF) exposure from FCC licensed antenna facilities. In 1996, the FCC updated these rules, which were further amended in August 1997 by a Second Memorandum Opinion and Order. These new rules represent a consensus of the federal agencies responsible for the protection of public health and the environment, including the Environmental Protection Agency (EPA), the Food and Drug Administration (FDA), the National Institute for Occupational Health and Safety (NIOSH), and the Occupational Safety and Health Administration (OSHA).

Under the laws that govern the delivery of wireless communications services in the United States, as amended by the Telecommunications Act of 1996, the FCC has exclusive jurisdiction over RF emissions from personal wireless antenna facilities, which include cellular, PCS, messaging and aviation sites.² Pursuant to its authority under federal law, the FCC has established rules to regulate the safety of emissions from these facilities.

5. Comparison with Standards

Exhibit A shows the levels of RF electromagnetic energy as one moves away from the antenna facility. As shown in Exhibit A, the maximum power density is 0.003057 mW/cm² which occurs at 200 feet from the antenna facility. The chart in exhibit A also shows that the power density is only 0.00004 mW/cm² at a distance of 4 feet. Table 1 below shows the Maximum Permissible Exposure (MPE) limits established by the FCC. There are different MPE limits for public/uncontrolled and occupational/controlled environments.

Table 1: Maximum Permissible Exposure limits for RF radiation

<i>Frequency</i>	<i>Public/Uncontrolled</i>	<i>Occupational/controlled</i>	<i>Maximum power density at Accessible location</i>
Cellular	.580 mW/cm ²	2.9 mW/cm ²	0.003057 mW/cm ²
PCS	1 mW/cm ²	5 mW/cm ²	

The maximum power density at the proposed facility represents only 0.42% of the public MPE limit for PCS frequencies.

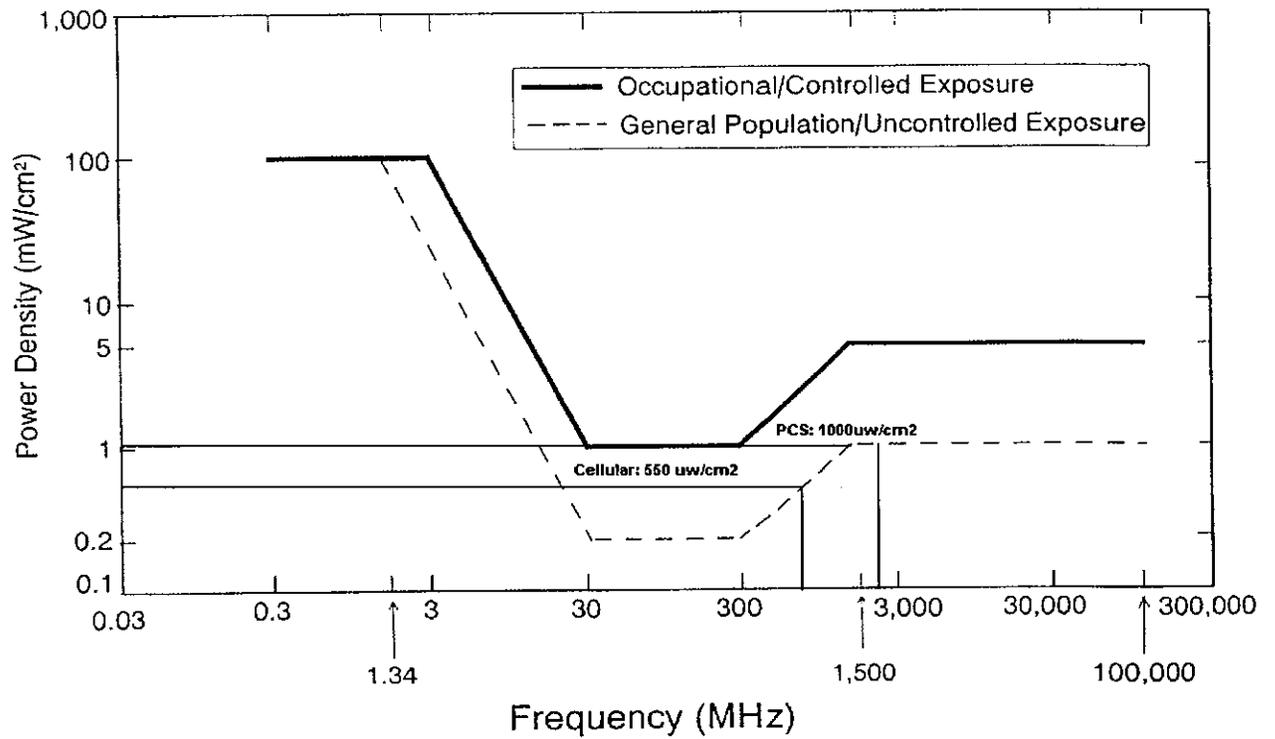
6. Conclusion

This analysis show that the maximum power density in accessible areas at this location is 0.003057 mW/cm², a level of RF energy that is well below the Maximum Permissible Exposure limit established by the FCC.

² 47 U.S.C. Section 332 (c) (7)(B)(iv) states that “[n]o State or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio frequency emissions to the extent that such facilities comply with the Commission’s regulations concerning such emissions.”

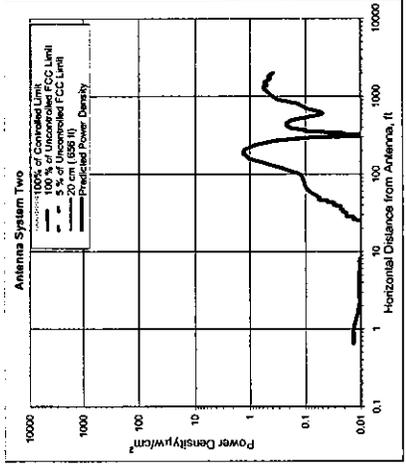
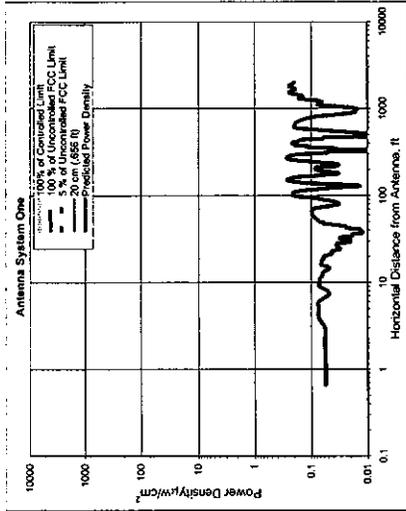
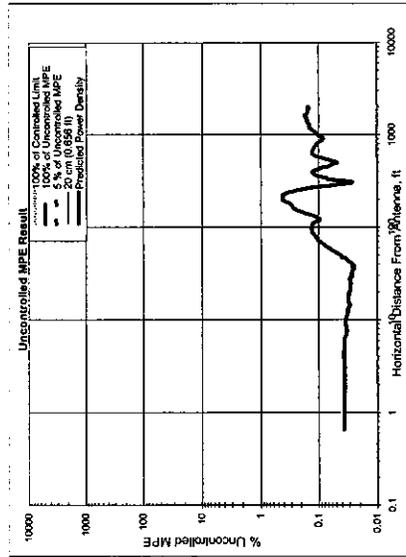
7. FCC Limits for Maximum Permissible Exposure

FCC Limits for Maximum Permissible Exposure (MPE)
Plane-wave Equivalent Power Density



8. Exhibit A

MPE RESULTS FOR CT-701



Number of Antenna Systems: 5

Meets FCC Controlled Limits for The Antennas Systems.

Meets FCC Uncontrolled Limits for The Antenna Systems.

Meets 5% of FCC Uncontrolled Limits for The Antenna Systems.

No Further Analysis Required.

Power Density	mW/cm²	0.03057	% of limit	0.42
Maximum Power Density	W/cm²	237.54	times lower than the MPE limit for uncontrolled environment	200.00
Composite Power (ERP)	Watts	28,000.00		

Site ID: 907-009-701
 Site Name: Ashford Southworth Rd
 Site Location: 20 Seals Rd
 Ashford, CT

Performed By: Satish Bhandare
 Date: 7/19/02

Antenna System One

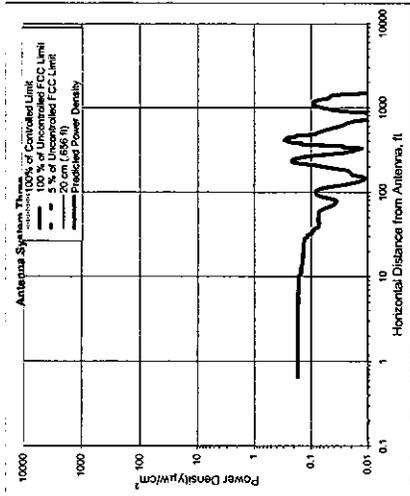
Frequency	MHz	1945.00
# of Channels	#	12
Max ERP/Ch	Watts	230.00
Max Pwr/Ch Into Ant.	Watts	5.86
Max Pwr/Ch Into Ant. (Center of Radiator)	Watts	140.00
Calculation Point (above ground or roof surface)	feet	0.00
Antenna Model No.		Algor: Z50.03
Max Ant Gain	dBd	10.30
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	5.11
Ant. H/W	degrees	65.00
Distance to Antenna	feet	137.45
W/O/S?	Y/N/?	n

Ant System ONE Owner: AT&T
 Sector: 3
 Azimuth: 0120240

Antenna System Two

Frequency	MHz	890.00
# of Channels	#	30
Max ERP/Ch	Watts	250.00
Max Pwr/Ch Into Ant.	Watts	15.77
Max Pwr/Ch Into Ant. (Center of Radiator)	Watts	134.00
Calculation Point (above ground or roof surface)	feet	0.00
Antenna Model No.		DB844H96-XY
Max Ant Gain	dBd	12.00
Down tilt	degrees	0.00
Miscellaneous Att.	dB	0.00
Height of aperture	feet	4.00
Ant. H/W	degrees	90.00
Distance to Antenna	feet	192.00
W/O/S?	Y/N/?	n

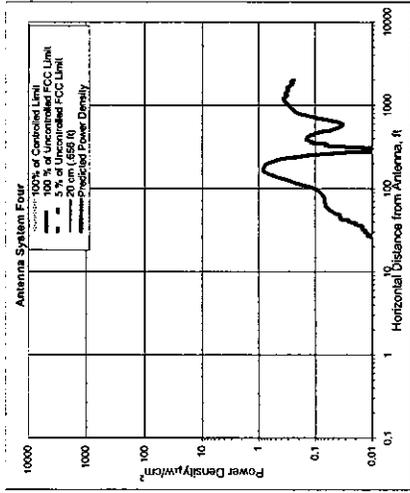
Ant System TWO Owner: Verizon
 Sector: 3
 Azimuth: 0120240



Antenna System Three

Parameter	Value	Units
Frequency	1950.00	MHz
# of Channels	12	#
Max ERP/Ch	500.00	Watts
Max Pwr/Ch Into Ant.	15.45	Watts
(Center of Radiation)	168.00	feet
Calculation Point	0.00	feet
(above ground or roof surface)	0.00	feet
Antenna Model No.	DB9503S0	
Max Ant Gain	15.10	dBd
Down tilt	0.00	degrees
Miscellaneous Att.	0.00	dB
Height of aperture	5.00	feet
Ant. HBW	90.00	degrees
Distance to Antenna	165.00	feet
WGS7	Y/N?	
	n	

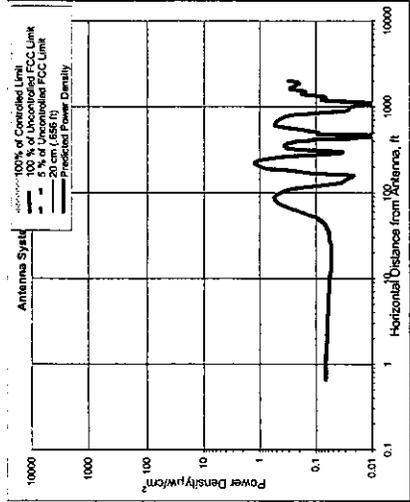
Ant System Three Owner: Sprint PCS
Sector: 3
Azimuth: 0120/240



Antenna System Four

Parameter	Value	Units
Frequency	850.00	MHz
# of Channels	16	#
Max ERP/Ch	250.00	Watts
Max Pwr/Ch Into Ant.	15.77	Watts
(Center of Radiation)	177.00	feet
Calculation Point	0.00	feet
(above ground or roof surface)	0.00	feet
Antenna Model No.	DB644990-XY	
Max Ant Gain	12.00	dBd
Down tilt	0.00	degrees
Miscellaneous Att.	0.00	dB
Height of aperture	4.00	feet
Ant. HBW	90.00	degrees
Distance to Antenna	175.00	feet
WGS7	Y/N?	
	n	

Ant System Four Owner: Nextel
Sector: 3
Azimuth: 0120/240



Antenna System Five

Parameter	Value	Units
Frequency	850.00	MHz
# of Channels	30	#
Max ERP/Ch	250.00	Watts
Max Pwr/Ch Into Ant.	7.91	Watts
(Center of Radiation)	150.00	feet
Calculation Point	0.00	feet
(above ground or roof surface)	0.00	feet
Antenna Model No.	DUC-44-5570	
Max Ant Gain	15.00	dBd
Down tilt	0.00	degrees
Miscellaneous Att.	0.00	dB
Height of aperture	8.00	feet
Ant. HBW	90.00	degrees
Distance to Antenna	146.00	feet
WGS7	Y/N?	
	n	

Ant System Five Owner: Cingular
Sector: 3
Azimuth: 0120/240

9. For Further Information

Additional information about the environmental impact of RF energy from personal wireless antenna facilities can be obtained from the Federal Communications Commission:

Dr. Robert Cleveland
Federal Communications Commission
Office of Engineering and Technology
Washington, DC 20554

RF Safety Program: 202-418-2464
Internet address: rfsafety@fcc.gov
RF Safety Web Site: www.fcc.gov/oet/rfsafety

10. References

- [1] The Communications Act of 1934, as amended by the Telecommunications Act of 1996, 47 U.S.C. Section 332 (c)(7)(B)(iv).
- [2] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Notice of Proposed Rulemaking, ET Docket 93-62, 8 FCC Rcd 2849 (1993).
- [3] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Report and Order, ET Docket 93-62, FCC 96-326, adopted August 1, 1996. 61 Federal Register 41006 (1996).
- [4] *Guidelines for Evaluating the Environmental Effects of Radio frequency Radiation*, Second Memorandum Opinion and Order, ET Docket 93-62, adopted August 25, 1997.
- [5] *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio frequency Electromagnetic Fields*, OET Bulletin 65, August, 1997.



STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

Ten Franklin Square, New Britain, CT 06051

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

E-Mail: siting.council@po.state.ct.us

Web Site: www.state.ct.us/csc/index.htm

August 20, 2002

Honorable John M. Zulick
First Selectman
Town of Ashford
Knowlton Memorial Town Hall
25 Pompey Hollow Road
P O Box 38
Ashford, CT 06278

RE: **EM-AT&T-003-020808** - AT&T Wireless PCS, LLC d/b/a AT&T Wireless notice of intent to modify an existing telecommunications facility located at 20 Seles Road, Ashford, Connecticut.

Dear Mr. Zulick:

The Connecticut Siting Council (Council) received this request to modify an existing telecommunications facility, pursuant to Regulations of Connecticut State Agencies Section 16-50j-72.

The Council will consider this item at the next meeting tentatively scheduled for September 5, 2002, at 1:30 p.m. in Hearing Room One, Ten Franklin Square, New Britain, Connecticut.

Please call me or inform the Council if you have any questions or comments regarding this proposal.

Thank you for your cooperation and consideration.

Very truly yours,

S/ Derek Phelps
Executive Director

SDP/slm

Enclosure: Notice of Intent

c: Stephen Lowry, Zoning Enforcement Officer, Town of Ashford