



STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

Ten Franklin Square  
New Britain, Connecticut 06051  
Phone: (860) 827-2935  
Fax: (860) 827-2950

July 18, 2002

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

RE: **EM-AT&T-166-020626** - AT&T Wireless notice of intent to modify an existing telecommunications facility located at 1233 Wolcott Road, Wolcott, Connecticut.

Dear Attorney Fisher:

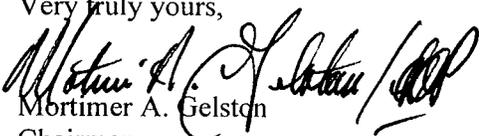
At a public meeting held on July 11, 2002, the Connecticut Siting Council (Council) acknowledged your notice to modify this existing telecommunications facility, pursuant to Section 16-50j-73 of the Regulations of Connecticut State Agencies with the condition that all coax be evenly distributed as recommended by Anthony P. Manzi, PE, in his letter dated June 14, 2002.

The proposed modifications are to be implemented as specified here and in your notice received June 26, 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 Michael A. DeNegrìs, Mayor, Town of Wolcott  
Central Naugatuck Regional Planning Agency, Town of Wolcott  
AAT Communications Corporation  
Julie M. Donaldson, Esq., Hurwitz & Sagarin LLC  
Thomas F. Flynn III, Nextel Communications Inc.

RECEIVED  
JUN 26 2002  
CONNECTICUT  
SITING COUNCIL

**NOTICE OF INTENT TO MODIFY AN  
EXISTING TELECOMMUNICATIONS FACILITY AT  
1233 WOLCOTT ROAD, WOLCOTT, CONNECTICUT**

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 1233 Wolcott Road, Wolcott, Connecticut (the "Wolcott Road Facility"), owned by AAT Communications Corporation. AT&T Wireless and the tower owner have agreed to share the use of the Wolcott Road Facility, as detailed below.

**The Wolcott Road Facility**

The Wolcott Road Facility consists of an approximately three hundred fifty (350) foot lattice tower (the "Tower") and associated equipment currently being used for wireless communications by Sprint, Nextel and others. A chain link fence surrounds the Tower compound. The current surrounding land uses are predominantly commercial and the site is buffered by natural vegetation.

**AT&T Wireless' Facility**

As shown on the enclosed plans prepared by Natcomm, LLC, including a site plan and tower elevation of the Wolcott Road Facility, AT&T Wireless proposes shared use of the Facility by placing antennas on the Tower and equipment cabinets needed to provide personal communications services ("PCS") within the existing fenced compound. 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 within the fenced compound. As evidenced in the letter of structural integrity prepared by Manzi Engineering, 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**

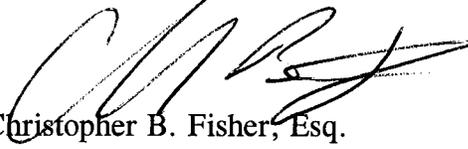
The proposed addition of AT&T Wireless' antennas and equipment to the Wolcott Road Facility constitutes an exempt "modification" of an existing facility as defined in Connecticut General Statutes Section 16-50i(d) and Council regulations promulgated pursuant thereto. Addition of AT&T Wireless' antennas 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 Prabhakar Kumar Rughoobur, Radio Frequency 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 Wolcott Road Facility meets the Council's exemption criteria.

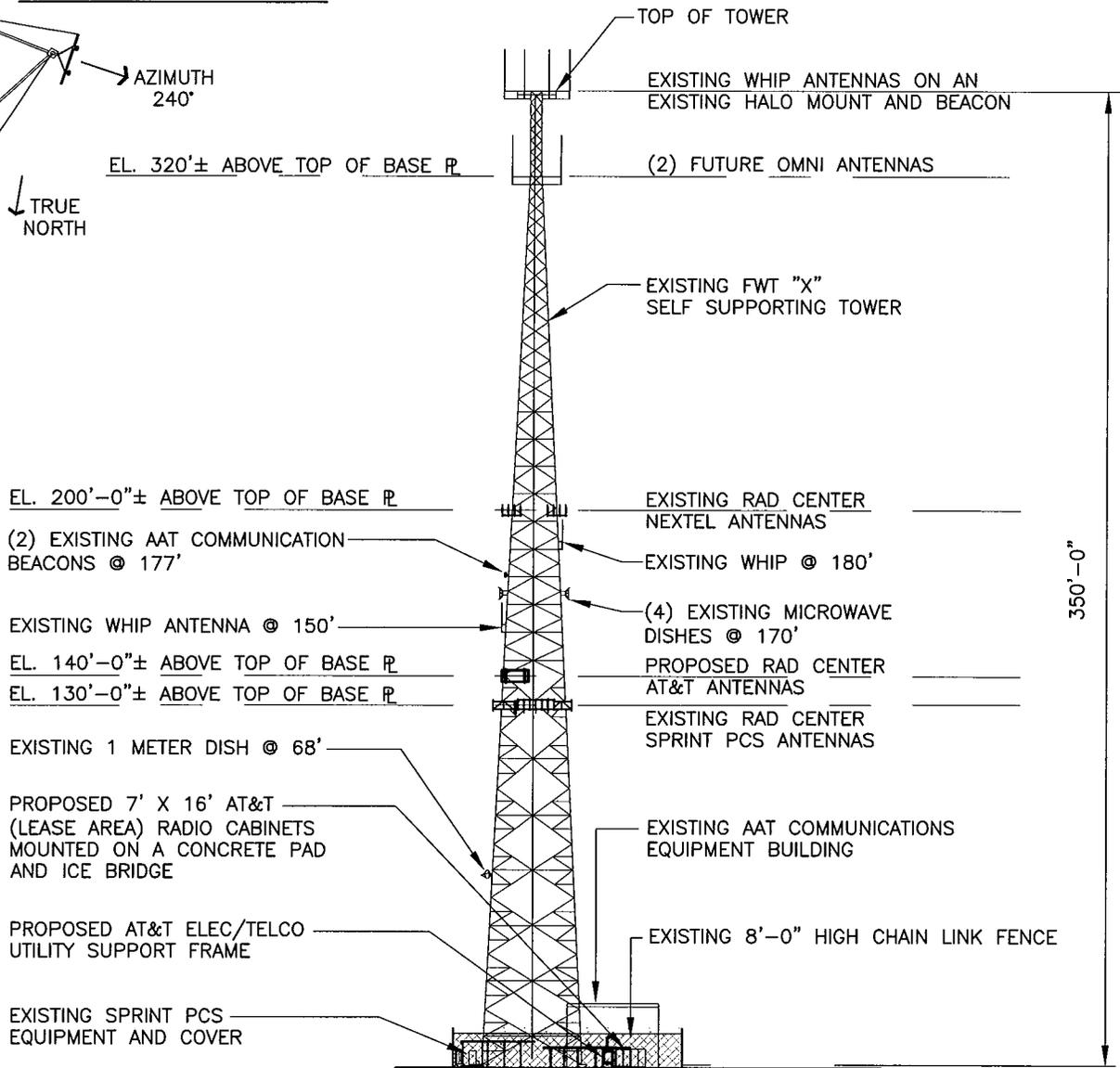
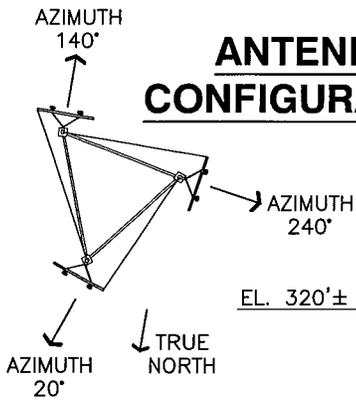
Respectfully Submitted,



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

cc: Mayor, Town of Wolcott  
Joanne Desjardins, Pinnacle

# ANTENNA CONFIGURATION



**2**

## TOWER ELEVATION

SCALE: 1" = 60'-0"

NOTE:  
 STRUCTURAL ANALYSIS BY MANZI ENGINEERING OF A 350' FWT INC. TOWER WOLCOTT-WOLCOTT ROAD, 1233 WOLCOTT ROAD, WOLCOTT, CT 06716 (CT-620) DATED JUNE 14, 2002 BY ANTHONY P. MANZI, LICENSE NUMBER 14291.

**"ISSUED FOR SITING COUNCIL"**

**Natcomm, LLC**  
 63-2 North Branford Road  
 Branford, Connecticut 06405  
 Tel. (203) 488-0580  
 Fax (203) 488-8587  
 Consulting Engineers - Project Management  
 Civil - Structural - Mechanical - Electrical

**AT&T**  
 AT&T WIRELESS PCS LLC  
 12 OMEGA DRIVE  
 STAMFORD, CONNECTICUT 06907

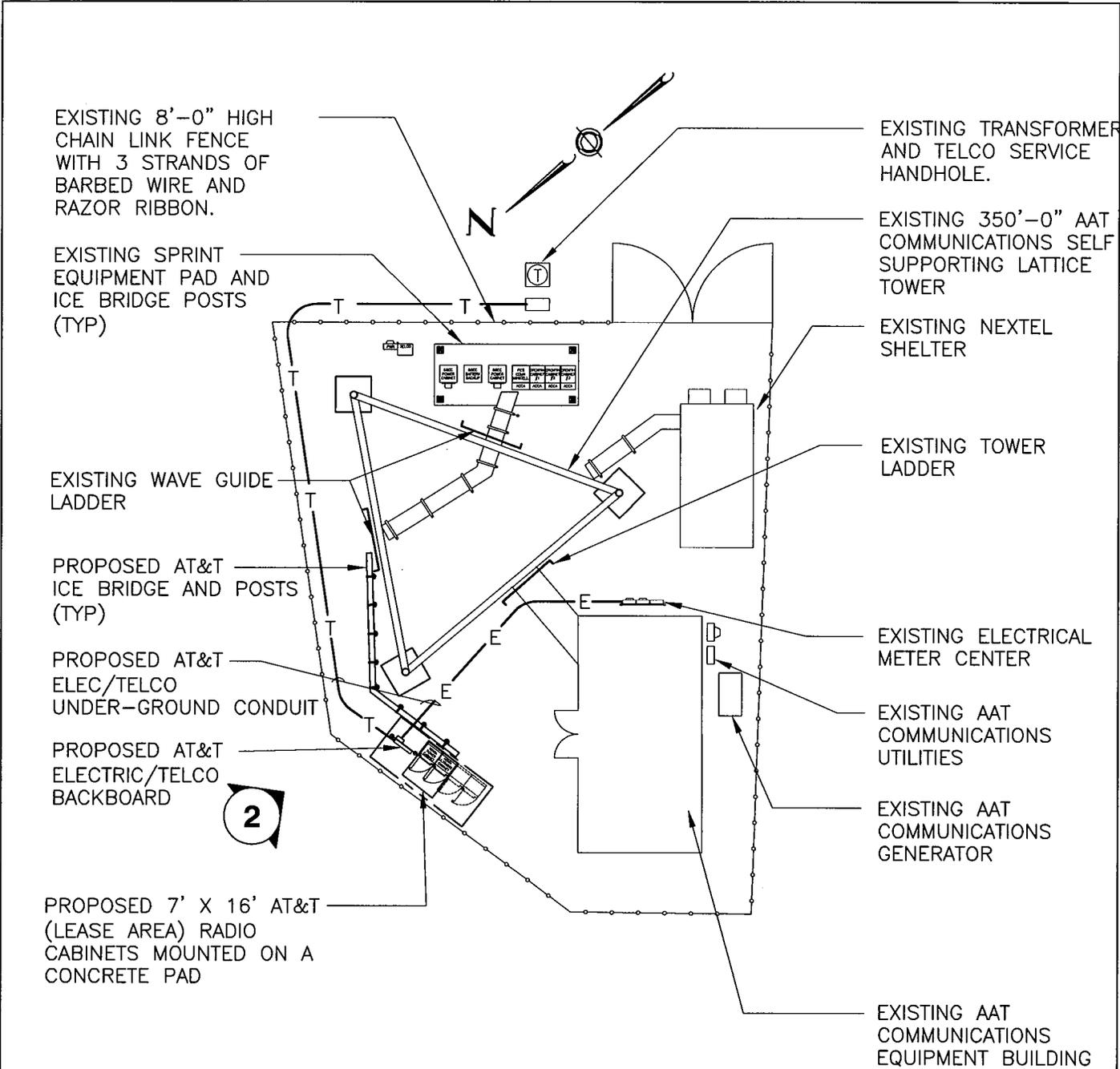
**DRAWING TITLE:**  
 SITING COUNCIL

**PROJECT INFORMATION:**  
 WOLCOTT  
 CT-620  
 1233 WOLCOTT ROAD  
 WOLCOTT, CT 06716

**LESSOR:**  
 AAT COMMUNICATIONS CORP  
 11 MIDDLESEX AVENUE  
 WILMINGTON, MA 01887

**DRAWING NO.**  
 913-008-620A-SC2

REVISION NO. 1	DRAWN BY: CMS
DATE ISSUED: 06/24/02	CHECKED BY: JJP
SCALE: AS NOTED	APPROVED BY: CFC
	SHEET NO. 2 OF 2
A/E PROJECT NO: 537A	



**1** **COMPOUND PLAN**  
SCALE: 1" = 20'-0"

NOTE:  
LATITUDE: 41° 37' 16.23"  
LONGITUDE: 72° 58' 24.56"

**"ISSUED FOR SITING COUNCIL"**

 <p><b>Natcomm, LLC</b> 63-2 North Branford Road Branford, Connecticut 06405 Tel. (203) 488-0580 Fax (203) 488-8587</p> <p>Consulting Engineers - Project Management Civil - Structural - Mechanical - Electrical</p>	 <p><b>AT&amp;T</b></p> <p>AT&amp;T WIRELESS PCS LLC 12 OMEGA DRIVE STAMFORD, CONNECTICUT 06907</p>	<p><b>DRAWING TITLE:</b> SITING COUNCIL</p> <p><b>PROJECT INFORMATION:</b> WOLCOTT CT-620 1233 WOLCOTT ROAD WOLCOTT, CT 06716</p>	<p><b>DRAWING NO.</b> <b>913-008-620A-SC1</b></p>								
		<p><b>LESSOR:</b> AAT COMMUNICATIONS CORP 11 MIDDLESEX AVENUE WILMINGTON, MA 01887</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">REVISION NO. 1</td> <td style="width: 50%;">DRAWN BY: CMS</td> </tr> <tr> <td>DATE ISSUED: 06/24/02</td> <td>CHECKED BY: JJP</td> </tr> <tr> <td>SCALE: AS NOTED</td> <td>APPROVED BY: CFC</td> </tr> <tr> <td colspan="2" style="text-align: right;">SHEET NO. 1 OF 2</td> </tr> </table>	REVISION NO. 1	DRAWN BY: CMS	DATE ISSUED: 06/24/02	CHECKED BY: JJP	SCALE: AS NOTED	APPROVED BY: CFC	SHEET NO. 1 OF 2	
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SCALE: AS NOTED	APPROVED BY: CFC										
SHEET NO. 1 OF 2											
<p>A/E PROJECT NO: 537A</p>											

**MANZI ENGINEERING**

3 CIFRE LANE  
PLAISTOW, NH 03865  
(603) 382-6219  
(603) 475-1394 cell  
(603) 382-3727 (fax)

*SPECIALIZING IN TELECOMMUNICATIONS  
RELATED STRUCTURAL ENGINEERING*

June 14, 2002

Natcomm, L.L.C.  
63-2 North Branford Road  
Branford, CT 06405  
Attn: Jason Pintek

Dear Jason,

Per your recent request I am providing you with this analysis of the existing 350 ft "FWT Inc" tower located in Wolcott, CT. This analysis considers the addition of 6 Allgon 7250.03 panels mounted 140 ft agl on 3 new t-arm mounts. It also considers 4 future dishes at 170 ft agl and 3 new whips mounted near the top as listed below.

This analysis was done in accordance with the EIA/TIA-222-F "Structural Standards for Steel Antenna Towers and Antenna Supporting Structures". Wind loads were generated for a basic design wind speed of 85 mph and a loading combination that included 1/2" of radial ice as is required for New Haven, County.

All pertinent tower information was taken from the April 8, 1992 FWT "Structure Field Note" (assembly drawings) and the April 12, 1992 FWT stock list for their job# 5554, Wolcott, CT as supplied by you and are assumed to be correct. Also included in the information supplied is the original FWT foundation design drawing dated April 9, 1992.

All tower existing and proposed loadings, structural properties and existing foundation information are as supplied by NATCOMM LLC.

**PROPOSED FINAL CONFIGURATION:**

- 6 whips mounted on existing halo type mount at 350' AGL
- 2 future whips on side arm frames at 320' AGL
- 12 DB 844 panels at 200' AGL on 15' frame mounts
- 1 whip and side arm frame at 180' AGL
- 2 beacons at 177' AGL
- 4 future Radiowave SP4d dish antennas with radomes at 170' AGL
- 1 whip and side arm frame at 150' AGL
- 6 new Allgon 7250.03 panels on t-arms at 140' AGL
- 12 DB 980H panels @ 130' AGL on 15' frame mounts
- 1 - 1 meter dish at 68' AGL
- All associated coax evenly distributed on 3 faces in existing support ladders

**Based on my investigation the above listed final configuration meets all the structural requirements of the EIA/TIA-222 -F "Structural Standards for Steel Antenna Towers and Antenna Supporting Structures".**

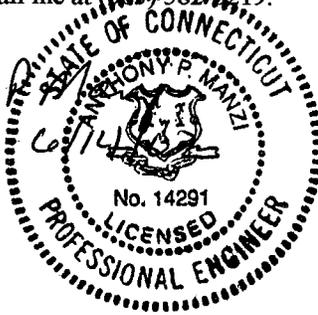


Note it is essential that all coax be evenly distributed on all 3 faces of the tower using the existing support ladders.

*Any changes in antenna type, mounting location or routing of coax could affect the validity of this analysis and should be reevaluated.*

I appreciate this opportunity to assist you and look forward to working with you in the future. If you have any questions please call me at (603) 882-6219.

Sincerely,  
  
Anthony P. Manzi  
Professional Engineer



## Power Density Calculation

CT-903 Wolcott  
 1235 Wolcott Road  
 Wolcott CT

Proposed Marcus Communications LLC antennas:

Transmitter	Frequency	CT Standard (mW/cm <sup>2</sup> )	Number of Channels	ERP/channel (mW)	Centerline of transmitter (cm)	Antenna Gain (dBi)	Power density calculated at tower base	Percentage of CT and Federal Standard
Proposed Transmit Antenna	450-490MHz	0.3	5	100000	10028.0	10	0.00396	1.3189%
Proposed Transmit Antenna	450-490MHz	0.3	5	100000	10028.0	10	0.00396	1.3189%
Proposed Microwave Dish	5.8GHz	1.00	1	100	5029.0	34.5	0.00001	0.0011%
Proposed Microwave Dish	5.8GHz	1.00	1	100	5029.0	34.5	0.00001	0.0011%
Proposed Microwave Dish	5.8GHz	1.00	1	100	5029.0	31.5	0.00001	0.0010%
Proposed Microwave Dish	5.8GHz	1.00	1	100	5029.0	28.5	0.00001	0.0009%
<b>Total Percentage</b>								<b>2.6418%</b>

$$S = (P \cdot G) / (4 \cdot \pi \cdot R^2)$$



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

SITE-ID : 913-008-620

June 20, 2002

**Prepared by AT&T Wireless Services, Inc.  
Prabhakar Kumar Rughoobur 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 1233 Wolcott Rd, Wolcott CT 06716. 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: <b>Wolcott</b>	
Number of simultaneously operating channels	<b>12</b>
Type of antenna	<b>Allgon 7250.03</b>
Power per channel (Watts ERP)	<b>250.0</b> Watts
Height of antenna (feet AGL)	<b>140.0</b> feet
Antenna Aperture Length	<b>5</b> 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 facility<sup>1</sup>:

$$PowerDensity = \frac{0.64 * N * EIRP(\theta)}{\pi * R^2} \text{ (mw/cm}^2\text{)} \quad \text{Eq. 1-Far-field}$$

Where, *N*= Number of channels, *R*= distance in cm from the RC (Radiation Center) of antenna, and *EIRP*(*θ*) = The isotropic power expressed in milliwatts in the direction of prediction point.

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

Where *P<sub>in</sub>/ch* = Input power to antenna terminals in watts/ch, *R* = distance to center of radiation, *h* = aperture height in meters, *α* = 3 dB band-width of horizontal pattern.

<sup>1</sup> 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 (cm<sup>2</sup>). 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.<sup>2</sup> 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 0.000273 mW/cm<sup>2</sup> which occurs at 270 feet from the antenna facility. The chart in exhibit A also shows that the power density is less than .000074 mW/cm<sup>2</sup> 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 <sup>2</sup>	2.9 mW/cm <sup>2</sup>	.000273 mW/cm <sup>2</sup>
PCS	1 mW/cm <sup>2</sup>	5.0 mW/cm <sup>2</sup>	

The maximum power density from AT&T's proposed system at the proposed facility represents only 0.0273 % of the public MPE limit for PCS frequencies. Since there are multiple transmitters at this site operating at different frequencies, the proper method for evaluating compliance with exposure limits is to find the percentage of MPE for each service, then sum the percentages to reach a total % of MPE for the site. (OET 65, pp 35-37)

From the last filing with the Connecticut Siting Council it is seen that the total exposure for this site was 8.4275 % of MPE. Adding the energy from the proposed AT&T system brings the total exposure to 8.4548 % of MPE for uncontrolled (general public) exposure.

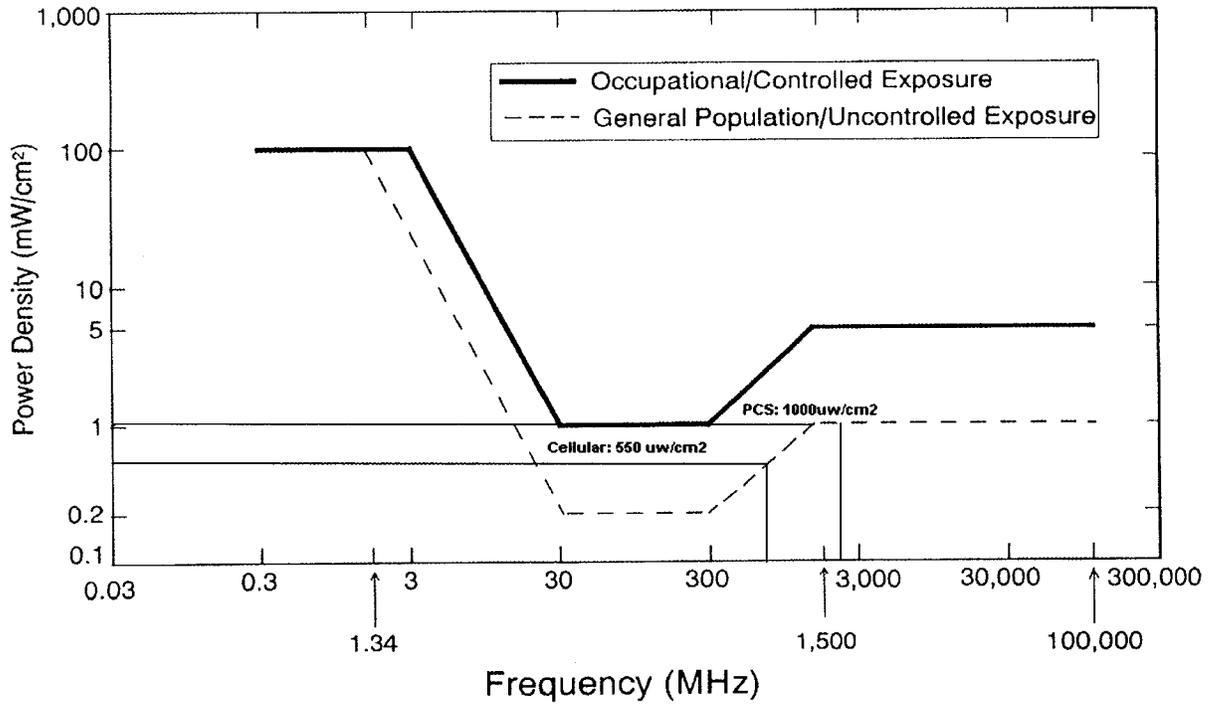
#### 6. Conclusion

This analysis show that the maximum power density in accessible areas at this location will be 8.4548 % of MPE, a level of RF energy that is well below the Maximum Permissible Exposure limit established by the FCC.

<sup>2</sup> 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

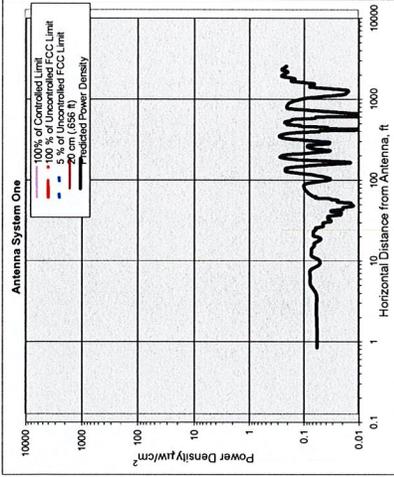
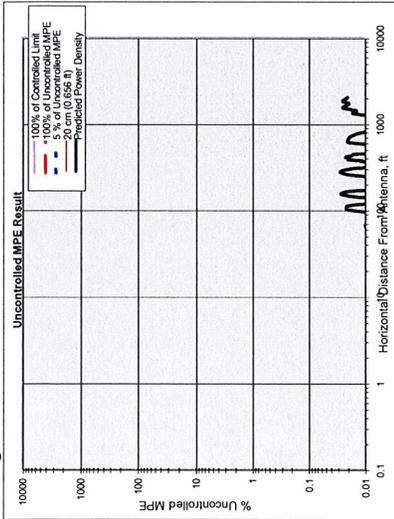
FCC Limits for Maximum Permissible Exposure (MPE)  
*Plane-wave Equivalent Power Density*



*AT&T Wireless Services, Inc.*

**8. Exhibit A**

**Heading**



**Number of Antenna Systems:** 1  
**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 Maximum Permissible Exposure (MPE) Analysis Required.**

Power Density	mW/cm <sup>2</sup>	@Horiz. Dist.
Maximum Power Density =	0.00073	% of limit
3.65743 times lower than the MPE limit for uncontrolled environment	0.03	feet
Composite Power (ERP) =	3,000.00	Watts
		270.00

Site ID: 913-008-620  
 Site Name: Wolcott  
 Site Location: 1233 Wolcott Rd  
 Wolcott, CT 06716

Performed By: Prabhakar K. Rughoobur  
 Date: 6/20/02

**Antenna System One**

Frequency	units	Value
# of Channels	MHz	1945.00
Max ERP/Ch	#	12
Max Pwr/Ch Into Ant.	Watts	250.00
Calculation Point (Center of Radiator)	Watts	5.86
(above ground or roof surface)	feet	140.00
Antenna Model No.	feet	0.00
Max Ant Gain	dB	0.00
Down tilt	degrees	16.30
Miscellaneous Att.	degrees	0.00
Height of aperture	dB	0.00
Ant HBW	feet	5.11
Distance to Antenna	degrees	65.00
WOS?	feet	137.45
	Y/N?	n

## 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](mailto:rfsafety@fcc.gov)  
RF Safety Web Site: [www.fcc.gov/oet/rfsafety](http://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.

antenna; and the remaining two will be 4-foot dish antennas; all located at a height of 165 feet on the tower. Marcus also plans to install two (2) 15-foot whip transmit antennas at a height of 320 feet on the tower and a 15-foot whip receive antenna on a halo mount at the top of the 350-foot tower (at which location already exist antenna of comparable height). Marcus' associated radio equipment consists of equipment racks in a 70 square foot leased area within an existing equipment shelter at the base of the tower.

For the following reasons, the proposed modifications to the Wolcott Facility fall squarely within and satisfy the requirements set forth in R.C.S.A. § 16-50j-72(b)(2):

1. The proposed modifications will not increase the height of the tower. The Marcus antennas will be installed at heights of approximately 350-, 320- and 165-feet above ground level (AGL), respectively. The enclosed plan confirms that the proposed Marcus installation will not increase the overall height of the tower.

2. The installation of Marcus' equipment within an existing building near the base of the tower will not require an extension of the site boundaries as evidenced by the enclosed plan. The proposed equipment location, fencing, access, and utility routing for Marcus will be located entirely within the existing site.

3. Because no additional HVAC equipment is required, the proposed modifications will not increase the noise levels at the existing facility by six decibels or more.

4. The operation of the additional antennas will not increase the total radio frequency (RF) power density, measured at the site boundary, to a level at or above the applicable standard. The "worst-case" RF power density calculations for a point at the tower base would be 2.6418% for the Marcus antennas. Based upon the existing information contained in Nextel's August 8, 2001 notice to modify an existing telecommunications tower, the calculated "worst-case" power density for the combined operations at the site is 8.4275% of the standard for general population/uncontrolled exposure.

For the foregoing reasons, Marcus respectfully submits that the proposed addition of its antennas and equipment at the Wolcott Facility constitutes an exempt modification under R.C.S.A. § 16-50j-72(b)(2).

Very truly yours,



Julie M. Donaldson

cc: Michael A. DeNegris, Mayor, Town of Wolcott  
Stephen M. Howard, Marcus Communications, LLC

**EM-AT&T-166-020626**  
**1233 Wolcott Road**  
**Wolcott 3/14/02**

