

STATE OF CONNECTICUT  
SITING COUNCIL

PETITION OF NEW CINGULAR  
WIRELESS PCS, LLC ("AT&T") TO THE  
CONNECTICUT SITING COUNCIL FOR  
A DECLARATORY RULING THAT NO )  
CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED IS  
REQUIRED FOR A PROPOSED  
TEMPORARY TOWER TO BE  
LOCATED OFF OF ANCIENT HIGHWAY  
IN THE TOWN OF EAST LYME, CONNECTICUT  
STATE OF CONNECTICUT  
SITING COUNCIL

PETITION NO. 1152

: JUNE 1, 2015

**INTERROGATORIES TO APPLICANT**

The following Interrogatories are directed to the Applicant by the Intervenor, East Lyme Residents.

1. When was AT&T first notified that the Scott Road Tower lease was not going to be renewed.
2. What actions if any did AT&T take at that time to secure adequate coverage for the impacted service area.
3. What date is the Scott road Tower due to be decommissioned including all extensions?
4. When did AT&T or it's representative first contact the owner of the subject property concerning the possibility of utilizing the Ancient Highway site to locate both the temporary and permanent tower?
5. Describe the type of communication described in the previous interrogatory that took place and the timeframe from first contact until a lease or Memorandum was executed.
6. The petitioner claims that they are entitled to an expedited process with regards to the temporary tower application. Please describe the rationale which supports a summary action in lieu of the fact that the petitioner has linked the temporary and permanent tower application and by its own admission prefers the Ancient Highway temporary tower site for the location of the permanent tower.

7. Since it is clear the petitioner intends to pursue a permanent tower on the site identified in this petition and that the temporary tower while minimally effective will cause a major impact on the community explain the petitioner's objections to allowing a comprehensive review process to move forward.

8. Please provide in detail any and all alternate locations considered for the temporary tower including those offered by the Town of East Lyme.

9. Has the petitioner considered the fact that more than one replacement tower may be needed to provide adequate service to the community on an ongoing basis?

10. Describe any and all outreach efforts made by the petitioner to inform the impacted neighborhoods and not just abutting property owners of the impending application including official notifications, community meetings etc.

11. Please describe what methods the Petitioner engaged to ensure meaningful community involvement in this Petition process.

12. In a response to a question posed by the CSC regarding an alternate route to the subject property, the petitioner claims that this alternative was proposed by a member of the East Lyme Residents. Please identify who proposed the alternate route and the relative benefits of this alternate route compared to the initial route.

13. By what method was it determined that identified alternate sites did not meet the needs of the Applicant? If studies were conducted to confirm the utility of the alternate sites, please provide copies of those studies?

14. In the Site Search Summary (p.40-46) please submit for each site which was "rejected by AT&T's engineers" the data upon which the site was rejected.

15. Has the Petitioner performed any analysis of locating multiple towers just above the treeline to provide coverage for the same area as one large monopole which looms over the surrounding residential neighborhoods?

16. The Petitioner has attempted to depict the visual impacts of the tower on Seebeck, Chris Allen, McKinnon and Ancient Highway. Has or will the Petitioner agree to perform an analysis of the visual impact from the proposed facility on residential receptors on Rose Lane, Poppy Street, and Bittersweet Lane?

17. Petitioner rejected an alternative location at 415 Boston Post Road (Between Joshua Valley Road and Scott Road), and 18 Drabik Road near Cedar Ridge Maintenance Shed or the 4th tee as 'not suitable

18. What antenna centerlines, antenna types and effective radiated power did the applicant assume to determine expected coverage from alternate sites indicated?

19. Utilities currently supporting the two residents on Ancient Highway were privately installed and the poles and wires are owned by the respective estates. The petition does not describe processes for obtaining utilities from these privately owned power lines and poles, yet infers that the utilities will be taken directly from the current poles. Please provide an explanation why plans requiring the use of private utilities have not been included in the Petition and/or discussed with the current owners and residents using these utilities.

a. Additionally, please provide an explanation of how ATT (or property owner) intends to negotiate and compensate the current owners of the utilities for access to these utilities.

20. If not consistently maintained, the 0.4 mile private portion of Ancient Highway where Applicant intends to access the site is impassable. Ancient Highway is currently being maintained, including grading, gravel and winter plowing by the two residents on Ancient Highway at the sole expense and efforts of these two residents. The petition does not describe any reference to maintenance and upkeep of the private portion of the driveway, nor does the petition involve solutions in any way in efforts to proactively address an obvious ingress/egress issue for residents of Ancient Highway. Ancient Highway is a single lane driveway and cannot be blocked at any time for any reason.

Please provide an explanation of how ATT (or property owner) will proactively prepare the driveway to ensure that the driveway can support the equipment and traffic associated with construction plans defined in the Petition and that ingress/egress is not compromised.

a. Additionally, please provide an explanation of how ATT (or property owner) will share in the cost and maintenance of the road including grading, gravel and winter plowing. Is there another combination of alternate sites that could be utilized to achieve the alleged coverage needs?

21. Several of the town or government owned sites listed in the site search summary highlight utilizing existing towers or water tanks but that these sites are rejected by AT&T frequency engineers. Please describe the feasibility of these alternate sites utilizing new tower construction and not the height of existing structures as described.

22. The Applicant refers in its responses to interrogatories to "consultation with municipal staff/agencies", please describe the date/time, parties involved and content of these discussions in greater detail.

23. Petitioner's response to the Council's interrogatory #6 refers to "provisioning of utilities including Ethernet service". Please, describe how the wiring for Ethernet service will be routed to the site.

24. Are there other sites in the community that is the subject of these proceedings at which the Applicant is considering developing wireless communications facilities? Please describe.

Respectfully Submitted,

Intervenor,

By \_\_\_\_\_  
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## CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 1st day of June, 2015 and addressed to:

Ms. Melanie Bachman, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig, 15 copies, plus 1 electronic) (US Mail/electronic).

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