

IN RE:

NEW CINGULAR WIRELESS PCS, LLC PETITION
FOR A DECLARATORY RULING, PURSUANT TO
CONNECTICUT GENERAL STATUTES §4-176 AND
§16-50K, FOR THE PROPOSED EXTENSION OF
AN EXISTING WIRELESS
TELECOMMUNICATIONS FACILITY LOCATED
AT 250 MERIDEN WATERBURY TURNPIKE,
SOUTHINGTON, CONNECTICUT.

PETITION NO. 1349

October 4, 2018

RESPONSES TO SITING COUNCIL INTERROGATORIES

Q1. Of the letters sent to abutting property owners, how many certified mail receipts were received? If any receipts were not returned, which owners did not receive their notice? Were any additional attempts made to contact those property owners?

A1. ***Notice of intent to file this Sub-Petition was sent to each abutting property owner on August 29, 2018. Of the abutting property owners that notice was sent to, a mail receipt was not received for 1 owner. The United State Postal Service tracking website indicates the mailing is still in transit and a receipt has not been returned at this time. Although this notice was not yet returned as undeliverable, we made a second attempt to notice this owner by sending notice by first class mail. Included as Exhibit A are a copy of the notice correspondence letter and a certification that it was mailed on September 28, 2018.***

Q2. What is the estimated cost of the modification and how does the petitioner intend to recover said cost?

A2. ***The estimated tower modification and extension costs are \$66,158.00. This is a typical AT&T capital cost improvement to their network.***

Site/tower

Q3. What other alternatives were considered? Why were these alternatives rejected?

A3. ***Given that AT&T has a lease with Crown Castle for its existing wireless facility at the Site, alternatives were not considered.***

Q4. Did the petitioner consider the tower farm on West Peak or the water tank or adjacent tower east of Village Gate Drive?

A4. ***As part of the site assessment, AT&T preliminarily evaluated the tower farm on West Peak, however collocating on one of these***

towers would cause interference with existing sites in Meriden and as discussed in A.3, AT&T has an existing lease with Crown Castle for its existing wireless facility at the Site.

- Q5. Does the existing tower have a yield point? If so, at what height and sector/direction?
- A5. **The existing tower is a self-support tower, which are not designed with yield points. However, the controlling section of the tower are the tower legs from 40'-60'. Thus, in the highly unlikely event of a tower failure due to a catastrophic event, the tower would fail and collapse upon itself at the existing 40'-60' leg section of the tower.**
- Q6. Has the yield point been considered in the proposed modification request to ensure that the tower setback radius remains within the boundaries of the subject property and if so, what is the conclusion?
- A6. **The AT&T extension SDD/Mod Design was not designed for a "yield point" (aka break point). As indicated in A5, in the unlikely event of a tower collapse, the tower would fail at the 40'-60' leg section and the tower would collapse onto itself and not onto any of the adjacent properties.**
- Q7. What is AT&T's backup power for the site? For extended commercial power outages what does AT&T plan to do?
- A7. **The Site is equipped with back-up batteries in the telecommunications shelter at the base of the tower that can handle short periods of commercial power outages (up to 8 hours). AT&T does not have a hardened emergency generator installed onsite. AT&T's policy for extended commercial power outages is to utilize a roll-up 40-50 KW diesel generator transported to the site. The site is equipped with a CAMLOC temporary power connection box and a manual transfer switch for connecting the diesel generator. This method of back-up power has been successfully deployed several times during the site's existence.**
- Q8. According to Notes on sheet Z-1 in the Site Plans, "the closest residence to the existing tower is \pm 10-feet" and "the nearest property line is \pm 86-feet", how does this relate to the tower setback, yield point and fall zone.
- A8. **In the highly unlikely event of a tower failure due to a catastrophic event, the tower would fail at the existing 40'-60' leg section of the tower. The extension does not change the weakest section of the tower being located at 40-60'. Theoretically, the sections above would topple over onto the lower sections and would collapse on itself. Therefore, the fall zone would remain on the subject parcel and would not fall onto any adjacent properties.**

Coverage/Capacity

Q9. Does AT&T have any statistics on dropped calls and/or ineffective call attempts in the vicinity of the proposed facility? If so, what do they indicate? Does AT&T have any other indicators of substandard service in this area?

A9. ***AT&T's dropped call data for this Site indicate elevated voice and data drops. In addition, data testing indicates that substandard or non-existent data service is provided within the area identified as a need for the proposed height extension. AT&T's existing facility is located mostly below the existing tree line in the area, causing signal blockage.***

Q10. What is the minimum height that the tower extension could be without compromising AT&T's wireless services?

A10. ***A 40-foot tower extension is needed to achieve the coverage necessary to provide reliable wireless services. As demonstrated in the tables below, in terms of comparison to a 20-foot tower extension (or 100-foot AGL):***

- ***At the -83 dBm threshold, an additional 20-foot extension to 120 feet AGL gains almost as much as the first 20-foot extension to 100 feet in area, population and road coverage.***
- ***At -93 dBm, an additional 20-foot extension to 120 feet AGL gains more overall and secondary road mileage and more population than the first 20-foot extension to 100 feet AGL.***

Southington at 100 feet AGL

	-83 dBm	-93 dBm	
New Coverage Area	0.21	0.35	square miles
New Pops Coverage	234	523	pops
New Roads Coverage	N/A	2.4	miles
	Main	1.0	miles
	Secondary	1.4	miles

Southington at 120 feet AGL

	-83 dBm	-93 dBm	
New Coverage Area	0.39	0.68	square miles
New Pops Coverage	456	1110	pops
New Roads Coverage	N/A	5.1	miles
	Main	1.6	miles
	Secondary	3.5	miles

Q11. How was the height of AT&T's antenna determined? What AT&T coverage objective requires an antenna height of 120-feet?

A11. ***The needed tower extension was based on the gain in coverage. The gain in coverage is achieved partly on gaining height above the terrain and partly on gaining height above the tree canopy. The AT&T antennas are currently at or below the surrounding tree canopy. Two of the three sectors are blocked by the tree line and surrounding terrain.***

Please refer to A10 for the coverage statistics.

Q12. Would use of a temporary tower-facility be necessary during construction? If so, could the temporary facility accommodate the equipment of both AT&T and Verizon?

A12. ***A temporary tower-facility is not necessary during construction. AT&T is proposing all new equipment on the tower and will be able to switch from the existing antennas to the proposed antennas within one (1) day. While the new equipment is being installed, AT&T's existing antennas will be moved slightly lower down the tower to facilitate the attachment of the extension, with no interruption in service. During this extension installation, a temporary minor decrease in coverage will result, but not an elimination of coverage. The new extension will bolt to the existing structure. There will be no shutdown for either AT&T or Verizon required for this upgrade.***

Environment

Q13. Did the visibility analysis include an assessment from nearby recreational resources, including parks and trails notably the New England Trail, a national scenic trail?

- A13. ***The tower is not visible from the nearby Castle Craig or Hubbard Park. The tower is visible from certain spots along the New England Trail, specifically near the existing tower farm on West Peak. During the balloon float on October 1, 2018, photos were taken from Castle Craig and Hubbard Park demonstrating that the site is not visible from Hubbard Park or Castle Craig. Responses to the second set of interrogatories, which will be provided to the Siting Council on October 11, 2018, will include photosimulations of the proposed facility from Castle Craig, Hubbard Park and the tower farm on West Peak.***
- Q14. Identify the nearest "Important Bird Area" as designated by the National Audubon Society? Would the proposed project adversely impact such IBA?
- A14. ***There are two Important Bird Areas within the vicinity of the site: East Rock Park, approximately 11 miles away, and Naugatuck State Forest, approximately 12 miles away. The proposed upgrade will not adversely impact these Important Bird Areas.***
- Q15. Would AT&T's proposed modified facility comply with recommended guidelines of the United States Fish and Wildlife Service for minimizing the potential for telecommunications towers to impact bird species?
- A15. ***Yes, AT&T's proposed modification complies with the recommended guidelines of the US Fish and Wildlife Service (USFWS). Crown Castle commissioned a NEPA report for the site which concludes that the tower, as upgraded, will comply with the USFWS's tower siting and design recommendations and is not anticipated to adversely affect migratory birds. Specifically, the existing self-supported lattice tower has no guy wires and will be extended to a height of 120 feet with an 11-foot tall lightning rod on top of the lattice extension. This height is less than the USFWS maximum and no lighting is proposed. As such, the tower will not impact migratory birds.***

**Supplemental Information in Response to Questions Raised During the
September 25, 2018 Site Visit**

- SQ1. Are these modifications part of the 5G upgrade?
- SA1. ***These modifications are not part of 5G but will be dual-technology capable so they will be compatible with 5G. The PCS radios E// 4415 are dual technology capable and the 850 5G will be deployed in the shelter utilizing the current UMTS hardlines.***
- SQ2. What is the RF Tier Rating for the site's capacity?
- SA2. ***This facility is a 1st Tier Site since it provides service to an interstate (I-691).***
- SQ3. Further explain the existing tower's structural capability to accommodate the proposed extension.
- SA3. ***A full Structural Modification Report prepared and certified by a CT Licensed PE was included as Exhibit 3 in the Petition. As this report indicates, the proposed extension was evaluated pursuant to all applicable structural codes and standards to accommodate AT&T's proposed 40-foot extension and loading by AT&T's proposed antennas and equipment, as well as Verizon's existing facility located at approximately 60-feet AGL. See Structural Modification Report prepared by Paul J. Ford & Company and certified by Joseph Pachicarah Jacobs, a CT Licensed Professional Engineer, dated March 16, 2018, included as Exhibit 3 of the filed Sub-Petition.***
- SQ4. Please clarify which platform design is proposed.
- SA4. ***The mounts in each view shed of the Visual Analysis are the same, they simply depict a different perspective because of the angle.***
- SQ5. On the coverage plots provided, is the red color in the key the same as the orange color depicted on the plots?
- SA5. ***Yes, the "red" color in the legend is meant to correspond to the orange color on the plot (< -83 dBm & >= -93 dBm) and the green color in the legend is meant to correspond to the lighter green color on the plot (>= -83 dBm).***
- SQ6. The Power Density report indicates that the power density will remain the same, but shouldn't it be improving since we are increasing height?
- SA6. ***The CSC database shows a total % MPE for AT&T at this site of 2.97%. SAI's report shows 17.64% total % MPE for AT&T at the increased height. This discrepancy is attributed to the following:***

- *The CSC applies a 10-dB reduction due to antenna pattern in their calculations for AT&T.*
- *The CSC calculations include various PCS and AWS frequencies and SAI's calculations do not.*
- *All the transmit powers are different.*
- *The CSC calculations do not include the assumption of a 6-foot-tall user.*

SQ7. If the facility is approved, when will construction start and how long will it take?

SA7. *Pending weather conditions, we anticipate the work starting in March of 2019. AT&T anticipates the upgrade will take approximately five (5) weeks.*

SQ8. Please confirm that antennas, RRUs and equipment will be painted to match the adjacent materials, in order to ensure there will be no adverse effects to National Register Sites.

SA8. *Yes, AT&T will comply with CT SHPO conditions and will, to the best of its ability, paint the antennas, RRUs and tower mounted equipment to match the tower structure.*

CERTIFICATE OF SERVICE

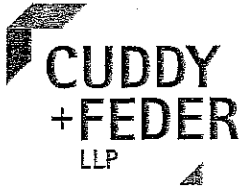
I hereby certify that on this day, an original and fifteen (15) copies of the foregoing was sent electronically and delivered to the Connecticut Siting Council via overnight mail.

Dated: October 4, 2018


Lucia Chiochio

cc: AT&T
SAI
C Squared
Town of Southington

EXHIBIT A



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Kristen Motel, Esq.
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September 27, 2018

VIA FIRST CLASS MAIL

Larkin Evaclare
20 Village Road
Southington, CT 06489

Re: New Cingular Wireless PCS, LLC ("AT&T")
Modifications to an Existing Wireless Facility
250 Meriden Waterbury Turnpike, Southington, Connecticut

Dear Sir or Madam:

Our office previously attempted to contact you on behalf of our clients, New Cingular Wireless PCS, LLC ("AT&T"), with respect to the above-referenced matter and our client's intent to file a petition for a declaratory ruling with the State of Connecticut Siting Council for approval of a modification to the existing wireless communications tower facility (the "Facility") owned by Crown Castle on the above-captioned property. A certified return receipt envelope was sent to your attention on August 29, 2018, but a signed receipt was not returned. The address listed for you corresponds with the records on file with the Town of Southington Tax Assessor's Office as an owner of property abutting the subject parcel detailed in the attached notice. This letter, along with a copy of the notice sent on August 29, 2018, is being sent via first class mail in the hope that this method may be successful in reaching you.

If you have any questions concerning this information, please do not hesitate to contact us.

Very truly yours,

A handwritten signature in dark ink, appearing to read 'Kristen Motel', is written over a horizontal line.

Kristen Motel
Enclosures

CERTIFICATION OF SERVICE

I hereby certify that on the 28th day of September 2018, a copy of the foregoing notice of the intended filing of a Petition with the Connecticut Siting Council for a declaratory ruling was resent by first class mail, as a second mailing to the abutter below:

Dated: 9/28/18 

Cuddy & Feder LLP
45 Hamilton Avenue, 14th Floor
White Plains, New York 10601
Attorneys for:
New Cingular Wireless PCS, LLC (AT&T)

Abutter:

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