

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 355
D/B/A VERIZON WIRELESS FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE :
AND OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY AT 359 :
LITCHFIELD ROAD IN NEW MILFORD, :
CONNECTICUT :
:
APPLICATION OF OPTASITE TOWERS INC. : DOCKET NO. 342
AND OMNIPOINT COMMUNICATIONS, INC. :
FOR A CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE :
AND OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY :
LOCATED AT 425 LITCHFIELD ROAD, NEW :
MILFORD, CONNECTICUT : MARCH 5, 2008

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
TO OPTASITE TOWERS LLC AND OMNIPOINT COMMUNICATIONS, INC.
PRE-HEARING INTERROGATORIES

On February 29, 2008, Optasite Towers LLC (“Optasite”) and Omnipoint
Communications, Inc. (“OCI”) issued Pre-Hearing Interrogatories to Cellco Partnership d/b/a
Verizon Wireless (“Cellco”), relating to the above-captioned dockets. Below are Cellco’s
responses.

Question No. 1

Please provide coverage plots, in the same scale and coverage level thresholds shown in Attachment 7 to the Application, from existing and approved Cellco sites and the Optasite location proposed in Docket 342 at 147 feet.

Response

The coverage plot requested is attached behind Tab 1. As illustrated on the coverage plot included in response to Council Interrogatory No. 11.b, however, Cellco can satisfy its coverage objectives in this area with antennas mounted at the 127-foot level at the proposed Optasite tower.

Question No. 2

Did Cellco investigate the possibility of co-locating on an existing CL&P structure at Route 202 (coordinates 41°38'-38" N; 73°24'17" W) or either structure adjacent to this CL&P structure?

- a) If not, why?
- b) Please provide a coverage plot at a height of 85 and 95 feet from this location including all existing and approved Cellco sites.

Response

Yes. Cellco did investigate the use of the above-referenced CL&P structure during the initial site search phase of its Litchfield County network build-out program. This location provides duplicate coverage to that provided by Cellco's existing New Milford facility at 4 Elkington Farm Road. This CL&P structure is located approximately 1.2 miles north of the Elkington Farm Road site. Due to terrain in the area, coverage from this CL&P structure, even at a theoretical antenna height of 150 feet, ends along Route 202 at approximately the same point

where Cellco's existing coverage ends from the Elkington Farm Road site. The coverage plots requested are attached behind Tab 2.

Question No. 3

Did Cellco investigate the possibility of co-locating on any other existing utility structures, CL&P structures or poles within a 1 mile radius of the proposed location at the Northville Fire Department? If not, why?

Response

There are no CL&P transmission line structures within a mile of the Northville Volunteer Fire Department site.

Question No. 4

Does Cellco currently have antennas and equipment located on a tower at a Charter Communications Tower located at 125 Ridge Road in New Milford? If so, at what height are Cellco's antennas located?

Response

No.

Question No. 5

If Cellco has not currently located at Charter Communications tower at 125 Ridge Road, did Cellco investigate the possibility of co-locating on that existing tower? If not, why?

Response

The existing Charter Communications ("Charter") tower is located approximately 2.0 miles southeast of Route 202 and approximately 1.5 miles south of Route 109 and would not satisfy Cellco's coverage objectives in the Northville area.

Question No. 6

When did Cellco first become aware of the Optasite site located at 425 Litchfield Road, proposed in Docket 342?

Response

Cellco first became aware of the Optasite proposal for a tower site at 425 Litchfield Road in February 2007 when Optasite contacted Cellco's real estate representatives. By that time, the Northville Volunteer Fire Department had executed the Cellco lease for a tower site at 359 Litchfield Road. Cellco executed the lease at the end of March, 2007.

Question No. 7

Did Cellco request and receive a copy of the technical report from Optasite representatives prior to the Optasite Application being filed?

Response

Yes.

Question No. 8

Why did Cellco wait until nearly three months after the record in the Optasite application in Docket 342 closed to file this application?

Response

The filing of the Cellco application was not tied, in any way, to any milestone dates associated with the Docket No. 342 application. Cellco filed its Docket No. 355 Application as soon as it completed its pre-application due diligence and was in a position to file a complete application package with the Council. Cellco has been very active recently, both as an applicant and intervenor in numerous Council dockets. In 2007 alone, Cellco pursued ten (10) new tower dockets of its own and intervened in six others. The time to take each of these new dockets from

a fully executed lease to the filing of a Council certificate application is generally between 6 and 12 months.

Once Cellco was prepared to move forward with the NVFD application, it commenced the municipal consultation process with the submission of its Technical Report to the Mayor of Town of New Milford on October 4, 2007. Section 16-50I(e) of the General Statutes requires the applicant to wait a minimum of 60 days following the submission of the Technical Report to file its application with the Council. The Cellco application was filed on December 7, 2007, 64 days after the commencement of the municipal consultation period.

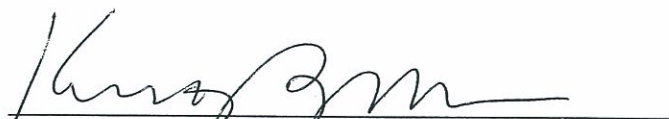
Furthermore, under the terms of the lease agreement, the NVFD has an expectation that Cellco will proceed with the necessary permits and approvals to construct the proposed tower site. Failing to do so may subject Cellco to claims under the terms and conditions of the lease.

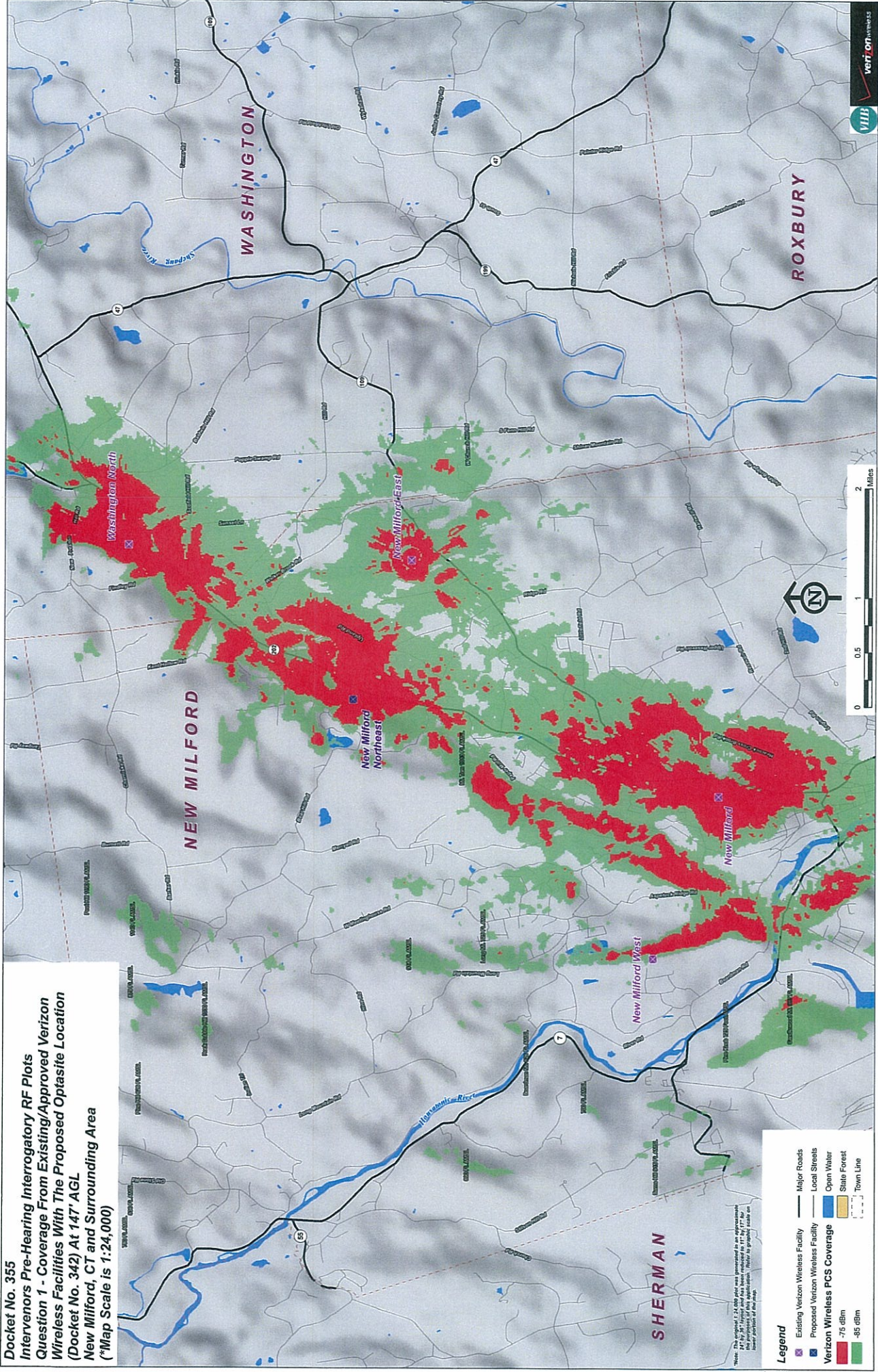
Regardless of when it ultimately filed the NVFD application, Cellco, in Docket No. 355, has presented the Council with a reasonable alternative to the Optasite tower location proposed in Docket No. 342. Consistent with its review criteria, the Council must consider whether better alternatives exist, including whether better alternative sites are available. The Council should be given the opportunity to explore the alternative site proposed at the NVFD property.

CERTIFICATION

This is to certify that on this 5th day of March, 2008, a copy of the foregoing was mailed,
postage prepaid, to the following:

Carrie L. Larson, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
P.O. Box 1821
Bridgeport, CT 06604-4247


Kenneth C. Baldwin



Docket No. 355
 Intervenor Pre-Hearing Interrogatory RF Plots
 Question 1 - Coverage From Existing/Approved Verizon
 Wireless Facilities With The Proposed Optasite Location
 (Docket No. 342) At 147' AGL
 New Milford, CT and Surrounding Area
 (*Map Scale is 1:24,000)

Legend

- Existing Verizon Wireless Facility
- Proposed Verizon Wireless Facility
- Local Streets
- Open Water
- State Forest
- Town Line

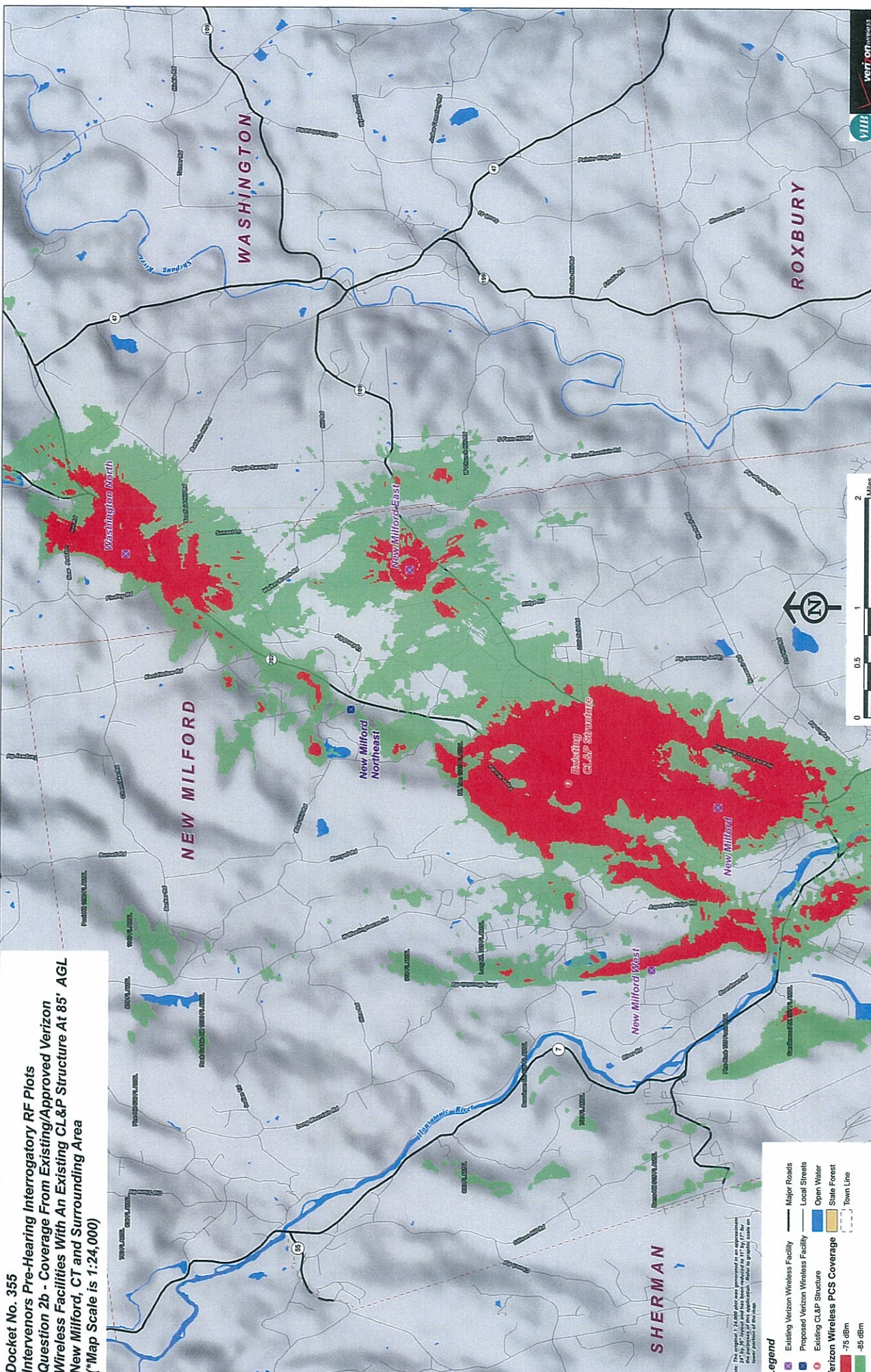
Verizon Wireless PCS Coverage

- 75 dBm
- 85 dBm

*Note: The original 7.5, 000 plot was generated as an overlay on the proposed facility locations. Water is graphically shown on some portions of the plot.



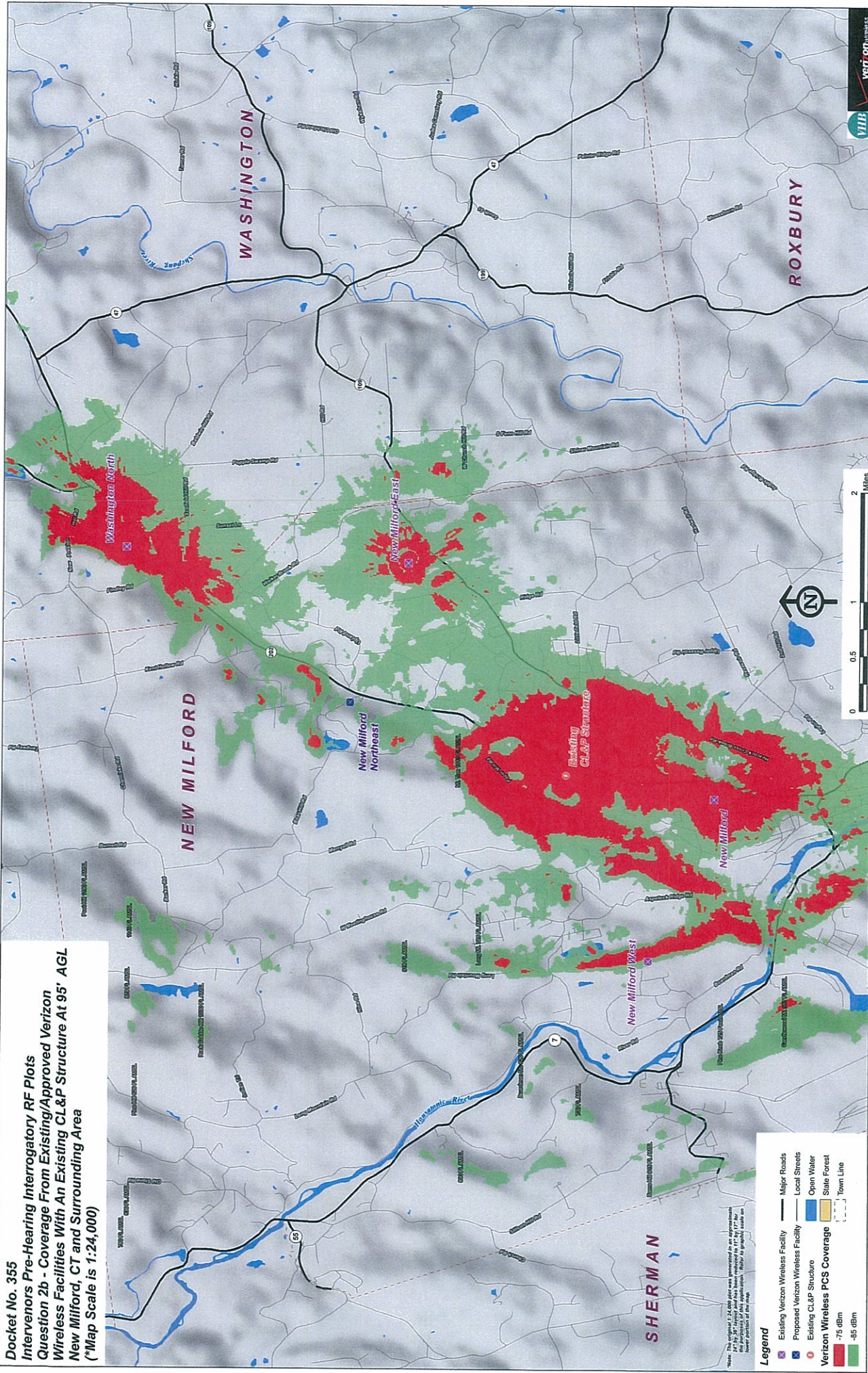
Docket No. 355
 Intervenor Pre-Hearing Interrogatory RF Plots
 Question 2b - Coverage From Existing/Approved Verizon
 Wireless Facilities With An Existing CL&P Structure At 85' AGL
 New Milford, CT and Surrounding Area
 (*Map Scale is 1:24,000)



Note: The original 1:24,000 plot was generated in an approximate 11' by 11' resolution. The 11' by 11' resolution plot has been re-sampled to the 15' by 15' resolution for this map. The 15' by 15' resolution plot is the authoritative version of the data.

- Legend**
- Major Roads
 - Local Streets
 - Open Water
 - State Forest
 - Town Line
 - Existing Verizon Wireless Facility
 - Proposed Verizon Wireless Facility
 - Existing CL&P Structure
 - Verizon Wireless PCS Coverage
 - 75 dBm
 - 85 dBm

Docket No. 355
Intervenor Pre-Hearing Interrogatory RF Plots
Question 2b - Coverage From Existing/Approved Verizon
Wireless Facilities With An Existing CL&P Structure At 95' AGL
New Milford, CT and Surrounding Area
 ("Map Scale is 1:24,000)



*Note: The 95' AGL 1.74,000 plot was generated in an approximation for the purpose of this application. Refer to graphical scale on lower portion of this map.

- Legend**
- Existing Verizon Wireless Facility
 - Proposed Verizon Wireless Facility
 - Existing CL&P Structure
 - Open Water
 - State Forest
 - Town Line
- Verizon Wireless PCS Coverage**
- 75 dBm
 - 85 dBm