

STATE OF CONNECTICUT
SITING COUNCIL

IN RE: SBA TOWERS II, LLC : DOCKET #396
APPLICATION FOR CERTIFICATE FOR :
TELECOMMUNICATIONS FACILITY AT 49 :
BRainerd ROAD IN THE TOWN OF EAST LYME : MARCH 1, 2010

**INTERROGATORIES TO SBA TOWERS II, LLC and INTERVENORS
NEWINGULAR WIRELESS AND CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS**

The following Interrogatories are directed to SBA TOWERS II, LLC. ("SBA"), and Intervenor, New Cingular Wireless/AT&T (AT&T) and Cellco Partnership/Verizon (Verizon). When referring to SBA or the Applicant or "you", the interrogatories are referring to SBA or any of its affiliates or corporate parents or subsidiaries and Intervenor wireless carriers and their subsidiaries or corporate parents.

It was apparent at the initial hearing that certain areas of technical expertise regarding the preparation of the application have been delegated or contributed by the proposed tenant carriers and others by SBA as tower developer. The Interrogatories are consolidated so that the Applicant and carrier intervenors may answer the questions which they are able.

1. Have you or your corporate predecessors or affiliates installed a micro-cell wireless communications facility in New York or New England?
2. If so, how many times and in what locations?
3. How many times have you successfully installed a micro-cell wireless communications facilities outside of Connecticut?
4. Are there other sites in East Lyme that you are considering developing wireless communications facilities? Please describe.

5. Please name all carriers with whom you have reason to believe will co-locate on the proposed facility.
6. Did you consider locating at the site located off Rte 156 in East Lyme at Latitude 41 18 57.48 Longitude 72 13 58.4 (Indian Woods Road)? Were you aware that this site has been leased by T-Mobile to provide coverage to the same area as the SBA proposed site? If so, explain why this site cannot provide adequate coverage to the target area with less visual impact.
7. Please provide coverage and visual impact maps (existing, proposed and combined) for the location identified above in Int #6. For the coverage maps please use the same coverage modeling program with the same inputs (other than those that are site specific), power assumptions, antenna configuration, loss ratios and scale as the proposed site and present the results on a clear plastic overlay for comparison purposes.
8. Please identify the size of the search ring and explain why that radius was chosen.
9. What is the percent of dropped calls in the target area?
10. Are you aware of the build out notification required of spectrum license holders filed with the FCC by any of the potential tenants on the proposed tower for the Basic Trading Area which includes East Lyme? Can you provide a copy of your 5 and 10 year build out notifications and any technical justification and/or coverage maps filed in conjunction therewith?
11. Have you performed drive tests to determine the need for coverage? If so, what methods were used and what data was gathered from the drive test?
12. In what way have you determined the public need for this particular facility?
13. Specifically what data do you have evidencing this public need?
14. How many residential wireless customers will this facility serve?
15. Are emergency communications for the Town of East Lyme being served

adequately at the present time?

16. Please produce any data or engineering reports which proves that the tower and its 'fail points' as designed will collapse into itself and not the neighbors' residential yards or the adjacent public trail head?
17. What surety does SBA propose to do to ensure the proper decommissioning of the facility once it is no longer needed or in use? And will SBA provide a bond to ensure decommissioning?
18. What percentage of the proposed screening trees for the facility will be guaranteed to survive five years?
19. Please describe the methods used by your visual impact consultant to calculate seasonal visibility.
20. How many audible decibels will the associated equipment produce at the nearest points of the property line for the proposed Brainerd Road site?
21. Do you have any data on the expected frequency of power outages requiring use of a backup ?
22. What computer software (name, producer, version) did you use in confirming the allegedly significant gap in coverage surrounding the site?
23. Is this software available for inspection so that others may make independent confirmation of its accuracy?
24. In generating the proposed coverage maps, what average tree height and leaf coverage was assumed in the model?
25. How was the height of 170 feet determined for the tower?
26. How are "repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies" not feasible in the proposed area of East Lyme ?
27. Why are such technologies not feasible?
28. What studies did you undertake to eliminate alternate technologies from

consideration given that they are of lesser impact to surrounding property uses?

29. Who conducted the feasibility studies on alternate technologies?
30. Please provide the feasibility studies or data by which you determined the lack of feasibility?
31. Have you considered using a combination of DAS or leaky coax along the rail lines in conjunction with a shorter tower to cover the target area?
32. Is there a particular standard or decibel signal strength which you believe is necessary for adequate coverage for PCS (1900MHz) service in the East Lyme area? For 850MHz service? For 700 MHz
33. What particular dBm signal strength do you believe is necessary for in-vehicle coverage for PCS (1900MHz), 700 MHz and 850MHz in the target area?
34. In the proposed coverage maps submitted by the Applicant, what loss margin was assumed in the modeling?
35. For any signal strength predicted by your coverage modeling, what percent-of-locations is assumed for reliability? (e.g: 85% of locations, 95%?)
36. Are you assuming that your target coverage is 'reliable service' or "adequate coverage"? Do these two terms differ? How do you define these two terms for the purposes of meeting the goals of the Telecommunications Act of 1996?
37. Please describe what a P.02 level of service is and what is required by the FCC.
38. If the proposed tower structure will have a diameter of 2 to 3 feet and antenna structures over 10 feet across, how does a balloon of 3 feet diameter to sufficiently place area residents on notice as to the true visual impacts of the proposed facility?
39. What number of residential homes are located on the road where the tower is proposed?
40. Do you have or have you conducted any studies regarding the impact of real

estate property values by nearby cell towers?

41. Have you performed an analysis of the likely impact on real property values of the residences in the immediate vicinity of the proposed facility on Brainerd Road?
42. When was the real estate value analysis conducted?
43. By whom was the real estate value analysis conducted?
44. Will you provide a copy of the real property value analysis performed by the Applicant?
45. Before making the current application, did you consider locating the tower closer to the lessor's house which is further away from the residences on Brainerd Road and is this a feasible alternative?
46. Has the Applicant explored either as a matter of general business policy or as a matter of formal planning with the Siting Council, the use of less-intrusive technologies for the provision of service in residential areas?
47. What was the result of any such planning identified in the previous interrogatory?
48. The Application targets coverage for mobile traffic on Route 156, Rte 95 and the Amtrak corridor. What data do you have indicating customer complaints or demands for service in these areas?
49. How many residences (as opposed to acres) will have year round views of the proposed towers? Seasonal views?
50. Your visual impact analysis indicates that 97% of the visibility of the tower will occur over open water. Did you simulate any of the views from open water or in any way determine the impact to the scenic views of tourists and residents using the open water for recreation?
51. **How many wireless customers of the Applicant have residences in the proposed coverage area? How many of those have complained about inadequate**

- technical service (as opposed to customer service, billing questions, etc.)?
52. What is the percentage of dropped calls and ineffective attempts, as compared to the remainder of the Market Trading Area in East Lyme?
 53. What is the lowest height you can construct a tower to improve coverage (with and without co-located carriers)?
 54. Please identify all properties listed on the National Register of Historic places within the viewshed of the proposed tower?
 55. Has the Applicant determined whether the area of the proposed facility is served by fiber optic cable?
 56. Please identify how many other future sites will be necessary, at a minimum to accomplish adequate coverage for East Lyme.
 57. Please identify any sites in addition to the Proposed Facility on which the Applicant intends to seek permission from the Siting Council to construct or modify a facility in the subject area?
 58. Is the ability to send text, image and video necessary for public safety? If so, how?
 59. Will changes in traffic usage necessitate heightening the tower beyond 170 feet, or contradict the need to install a 170-foot tower in the first place?
 60. Other than an inquiry into the DEP Natural Diversity Database, has the Applicant conducted any review of endangered or threatened species in the area of the Site?
 61. Will any blasting be necessary to complete construction of the facility? If so, what notice and in what form will be given to nearby property owners?
 62. Will construction practices conform to local building and zoning ordinances and regulations?
 63. Can you provide coverage propagation maps and isolated propagation maps for the proposed facility on clear plastic overlays using a scale that matches that

of the Application?

64. What is the minimum dBm signal strength to accomplish hand off of a call to an adjacent cell for 700Mhz, 850 MHz and 1900 Mhz?

Respectfully Submitted,

Friends of the Pattagansett Trust

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 2 day of March, 2010 and addressed to all parties and intervenors on the attached service list and as noted below.

Mr. S. Derek Phelps, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051.

Mail- SBA Towers, LLC c/o Carrie Larson, Esq., Pullman & Comley, LLP, 90 Statehouse Square, Hartford, CT 06103-3702 (860) 424-4312(860) 424-4370 fax

E-mail -- Cellco d/b/a Verizon c/o Kenneth Baldwin, Esq., Robinson & Cole, 280 Trumbull Street Hartford, CT 06103-3597 (860) 275-8200/ (860) 275-8299 fax kbaldwin@rc.com

E-mail- Russell Brown, 41 Brainerd Road, Niantic, CT 06357 (860) 739-5984/ (860) 691-1145 Fax rds@businessbookpress.com

Mail - Town of East Lyme c/o Edward O'Connell, Esq., Waller, Smith & Palmer, PC, 52 Eugene O'Neill Drive, P.O. Box 88, New London, CT 06320 (860) 442-0367/(860) 447-9915 eboconnell@wallersmithpalmer.com

Mail --New Cingular Wireless c/o Christopher Fischer, Esq., Cuddy & Feder, LLP, 90 Maple Avenue, White Plains, NY 10601 (914)761-1300/(914)761-5372fax

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