Site Search Process

Section 16-50j-74(j) of the Regulations of Connecticut State Agencies requires the applicant to submit a statement that describes "the narrowing process by which other possible sites were considered and eliminated." In accordance with this requirement, the descriptions of the general site search process, the identification of the target search area and the alternative locations considered for development of the proposed Groton Facility are provided below.

As a tower developer, MCF bases its decision to seek out a site in an area based on its knowledge and understanding of existing weaknesses in the systems of the several wireless carriers operating in the area and/or consultation with individual carriers. A target area is chosen central to the area in which the coverage and/or capacity needs have been identified. The area targeted is the geographical location where the installation of a site would, based on general radio frequency engineering and system design standards, be likely to address the identified problem. MCF's goal is to locate sites that will provide for orderly integration into the existing wireless systems of multiple carriers.

MCF's primary target area in its site search was to locate a potential site to provide coverage connection to area residents and along Interstate 95 between an existing tower located at the Transfer Station on Flanders Road to the West and an existing tower on Jerry Brown Road in Stonington near Exit 90 to the East. Based on existing and potential coverage shown in the RF data, the site needed to be very near exit 89 from Interstate 95 to fill the coverage gap.

MCF is sensitive to State and local desires to minimize the construction of new towers, and does not initiate searches in areas with known acceptable structures. In this area of Groton, there are several existing towers. However, those towers are either of insufficient height or too far from the target area to provide adequate coverage. In addition, there are several existing structures available for co-location but are either of insufficient height or too far from the target area to provide adequate coverage to the target area. Specifically: the smokestack on Oral School Road was too far east to connect the existing gap; the water tank on Nantucket Avenue was too far north; the steeple at the Church of God on Sandy Hollow Road was too far west; the Water Tank on Pequot Avenue was too far south; and the Fire Department tower on Cow Hill Road was of insufficient height and they further declined offers to lease space wherein MCF would construct a taller structure. Each of these locations is identified on the map attached hereto.

Finding no appropriate existing structures, MCF then studied the area to determine whether industrial or commercial areas or areas which have appropriate environmental and land use characteristics are present. In order to fill its coverage gap, MCF determined that the new structure would have to be located very close to exit 89 of Interstate 95. Because that area is almost

exclusively residential and characterized by smaller lots, MCF investigated the Mystic River Ambulance Association Site because it was a larger parcel of land and it was already dedicated to a commercial use. The Property is approximately a 3.35 acre wooded parcel currently used as a headquarters and parking for an ambulance dispatch services. Based on its elevation and location, a tower within the property would provide adequate coverage along the eastern part of Groton and along Interstate 95. In addition, development of a facility at this property will result in minimal clearing, grading and tree removal.

