

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

IN RE:

APPLICATION OF MCF
COMMUNICATIONS bg, INC. AND
OMNIPOINT COMMUNICATIONS, INC.
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE AND
OPERATION OF A TELECOMMUNICATIONS
FACILITY AT 237 SANDY HOLLOW ROAD IN THE
TOWN OF GROTON, CONNECTICUT

DOCKET NO. 343

DATE: OCTOBER 23, 2007

PRE-FILED TESTIMONY OF BRAD GANNON

Q1. Mr. Gannon, please summarize your professional background in telecommunications.

A. I am a partner at MCF Communications bg, Inc. ("MCF"). I have been part of the telecommunications industry for seven years and my primary focus is on property development, site acquisition, lease contract negotiations, and construction of newly-approved towers.

I have successfully completed all aspects of development activities for more than eighty sites through New England.

Q2. What is the purpose of your testimony?

A. My testimony provides background information relating to this application for a certificate of environmental compatibility and public need for the proposed Groton facility (the "Facility"). In addition, I will address the specific site search resulting in the proposed site and MCF and T-Mobile's activities prior to initiation of this application.

Q3. What is MCF's and T-Mobile's relationship in this application?

A. As described in detail below, MCF has a working relationship with T-Mobile to co-develop new tower facilities in the State of Connecticut. T-Mobile identified a need for a new facility in this area of Groton and MCF conducted the site search. The arrangement between T-Mobile and MCF provides for MCF and T-Mobile to make a joint application to the Council; for MCF to own, construct and maintain the site as the Certificate holder; and for T-Mobile to serve as the anchor tenant.

Q4. How does MCF conduct a site search?

A. MCF maintains a close relationship with T-Mobile, follows the development activities of others and has an in-depth understanding of the fluctuating market conditions. When T-Mobile contacted MCF regarding the need for a new facility in this area of Groton, MCF began its review of the area. The first activity after assignment of a search ring to acquisition personnel is a review of the area for a suitable existing structure. Only once MCF exhausts its search for existing structures on which to locate does it then begin to study the area for suitable locations to construct a new facility.

Once it is determined that no existing structures are suitable for co-location does MCF then begin to search for sites to construct a new facility. Potential locations are studied by radio frequency engineers to determine whether the locations will meet the technical requirements for a site in the area. The list of potential locations is further refined based on the willingness of property owners to make their property available.

Q6. Please describe MCF's search for the proposed Groton wireless facility.

A. MCF commenced a search for a site in this area of Groton in May, 2005. In that area, MCF found no existing towers suitable for use as a wireless communications facility. In addition, MCF identified no existing structures which were suitable for use and available. Specifically, MCF investigated the following existing structures: the smokestack on Oral School Road; the water tank on Nantucket Avenue; the steeple at the Church of God on Sandy Hollow Road; the water tank on Pequot Avenue; and the Fire Department tower on Cow Hill Road. The smokestack, church steeple and water tank were all too far out of T-Mobile's search ring and would not fill T-Mobile's existing coverage gap on I-95. MCF did approach the owners of the Fire Department tower on Cow Hill Road. The existing tower there is of insufficient height to provide coverage for T-Mobile's existing coverage gap. In addition, the owners rejected all offers to either extend the existing tower or replace the existing tower with a taller structure.

Turning to locations for a new facility, MCF found the search area was limited by existing residential development and extensive wetlands. Attached hereto as Exhibit 1 is a copy of a map depicting the existing wetlands in the area and other site search limitations. Therefore, MCF focused its search on non-residential uses within the search area. MCF investigated the possibility of locating a facility at the Precious Memories Daycare at 195 Sandy Hollow Road. The owner of that property was not interested in leasing for the development of a facility. MCF also investigated the possibility of locating the proposed Facility at

the Sandy Hollow Professional Bldg at 200 Sandy Hollow Road. This site was rejected because it did not have enough usable ground space for an equipment compound, it has substantial wetlands on the property and a low ground elevation, which would require a much taller facility.

The Mystic River Ambulance Association property (the "Property") was far superior to any other potential locations within the area because it is a larger tract of land (approximately 3.35 acres) and was already developed with a commercial use. In addition, because of its proximity to I-95 and its ground elevation, a Facility at the Site would fill T-Mobile's coverage gap. In addition, the development of the proposed facility at the Site will result in minimal clearing, grading and tree removal.

Q7. Have the Applicants consulted with municipal officials with regard to their plans?

A. Yes. On September 25, 2006, MCF hand-delivered a copy of the technical report to the Town of Groton. On December 11, 2006, MCF met with representatives from the Town of Groton including the Planning Director, Michael Murphy, and the Environmental Planner, Deborah Jones. The Town's representatives were offered the opportunity to conduct a site visit, which they did. The Town forwarded MCF several comments concerning the proposed Facility. All of those comments were incorporated into MCF's plans and this Application.

Q8. Has the Town of Groton expressed a need to locate emergency services equipment on the proposed Facility?

A. Yes. The Town of Groton has indicated that while they have no immediate need, the Town would like to reserve space on the proposed Facility for its emergency services. As is its practice, MCF will provide space on the proposed Facility for such use, free of charge.

Q9. Did MCF post a sign on the Property notifying the public of the hearing regarding the proposed Facility?

A. Yes. On Monday, October 15, 2007, MCF posted a sign, 4 feet by 6 feet in size at the Property. The sign provided notice to the public of the public hearing for this Application.

The statements above are true and complete to the best of my knowledge.

10-22-07
Date

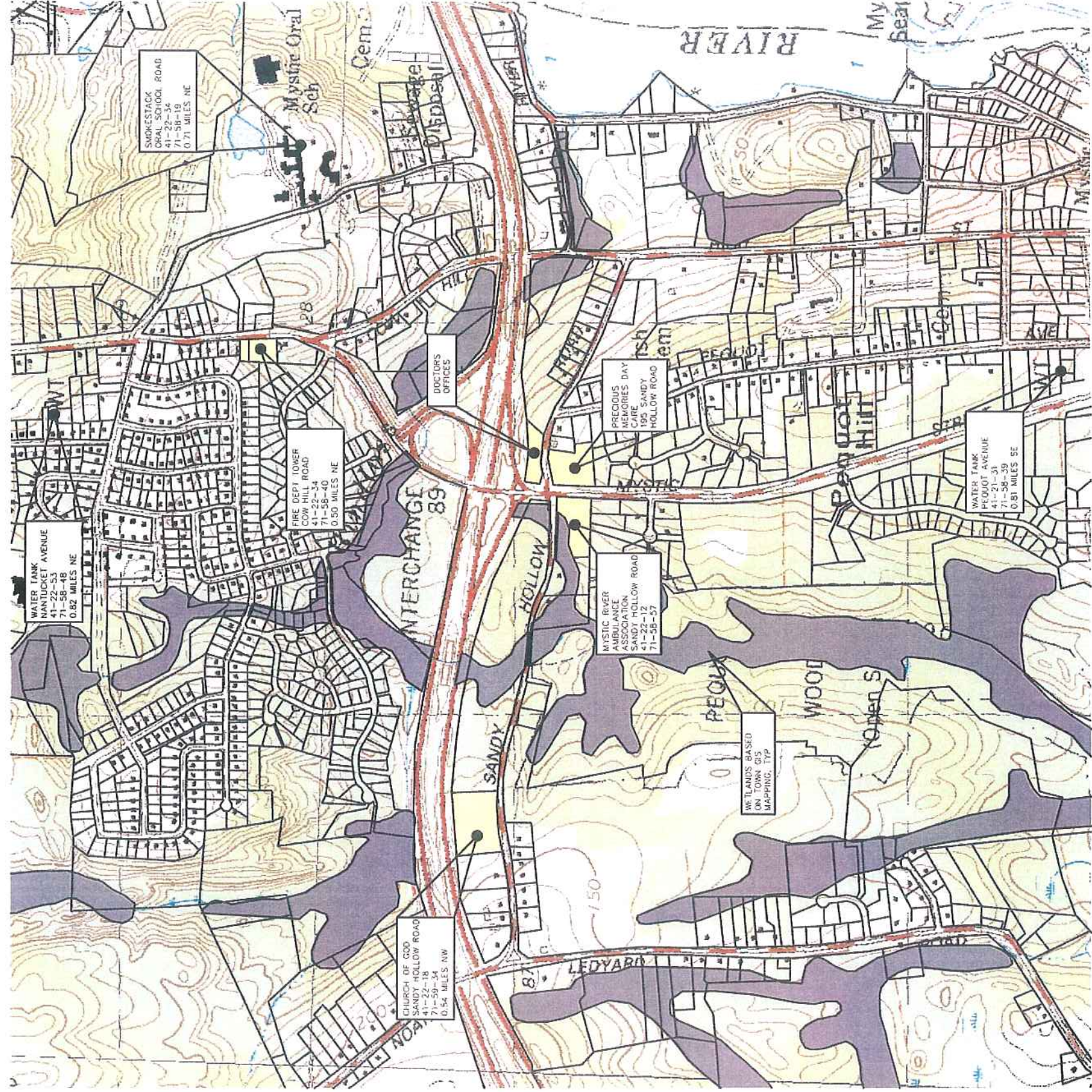
Brad Gannon
Brad Gannon

Subscribed and sworn before me this ___ day of October, 2007.

By: Ana Liza Vidigal Healy
Notary



ANA LIZAVIDIGAL HEALY
NOTARY PUBLIC
STATE OF PENNSYLVANIA
10/15/2011

EXHIBIT 1



COLOR KEY:

-  WETLANDS BASED ON TOWN GIS MAPPING
-  VEGETATED AREAS BASED ON USGS TOPOGRAPHY MAPS
-  DENSELY DEVELOPED AREAS

-  NON-VEGETATED AREAS BASED ON USGS TOPOGRAPHY MAPS
-  PRIMARY PARCELS OF INTEREST DURING SITE SEARCH



Drawing Copyright © 2007 Clough Harbour & Associates LLP

CH&A
 CLOUGH HARBOUR & ASSOCIATES LLP
 2159 State Deane Highway, Suite 212 · Rocky Hill, CT 06067-2336
 Main: (860) 257-4557 · www.cloughharbour.com

SITE NAME:
 MCF GROTON

SITE ADDRESS:
 237 SANDY HOLLOW ROAD
 GROTON, CT
 06355

NEW LONDON COUNTY

PROJECT NO.
 14957-1004

10/19/07

SITE SEARCH
FIGURE 02