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Via Federal Express

December 19, 2007

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


RE: Docket No. 348 – Responses to Interrogatories

Dear Mr. Phelps:

Enclosed for filing are an original and twenty copies of the Applicants' Responses to Interrogatories in Docket No. 348. An electronic version has been emailed to Ms. Mulcahy. If you have any questions, please feel free to contact me.

Very truly yours,

BROWN RUDNICK BERLACK ISRAELS LLP

By:  _____
Thomas J. Regan

40247047 v1 - MERCIECM - 080563/3235

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

Sprint Nextel Corporation and The Connecticut Light and Power Company's Application for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of a Telecommunications Facility Located off of Cove Road in Haddam, Connecticut. : **Docket No. 348**
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: December 19, 2007

APPLICANTS' RESPONSES TO INTERROGATORIES

1. When did the Applicants first establish a search area for the proposed site? Provide a diagram depicting the initial search ring.

In approximately 2001 Sprint began a preliminary review of its coverage needs in the Haddam area. Sprint investigated the possibility of attaching its antennas to a Northeast Utilities structure on property owned by John Rucker located on the western side of the Connecticut River in Haddam. The creation of a final search ring was cut short when Sprint learned in the fall of 2004 that CL&P was interested in rebuilding a tower off of Cove Road. Therefore, a search ring was never produced.

2. When and how did Sprint learn about CL&P's desire to replace the old tower at the proposed location?

On September 7, 2004, CL&P approached Cingular and Sprint to rebuild the tower off of Cove Road in Haddam. Cingular took the lead and began development of a new tower along with URS Corporation. Sprint briefly investigated existing structures in the area. Finding nothing that suited its purposes, Sprint decided to collocate on the new Cove Road tower. Sprint then terminated its access easement with John Rucker for access to the NU structure.

On May 9, 2006, Cingular informed Sprint that it was withdrawing its involvement with the Cove Road tower due to lack of funding. Shortly thereafter, Sprint began working with URS Corporation to complete development of the site. The Application did not get filed until October 2007 in large part because Sprint was working with the Connecticut State Police to incorporate their needs.

3. Is the proposed tower site in the exact location as the old tower?

Yes.

4. What is the grade of the former access road in its steepest location? What is the grade of the new access road in its steepest location?

The grade of the former access road at its steepest location is approximately 15%.
The grade of the new access road at its steepest location is approximately 12%.

5. Please resend the notice of the application to all abutters via first class mail with a revised application filing date and date of the Council's hearing in Haddam.

On December 14, 2007, Sprint resent notice of the application, including the date of the public hearing, to all of the abutting property owners via first class mail. A copy of the letters is attached.

6. Provide a multi-signal level coverage plot from the Nextel Fire Tower, Ager Spring Road, Haddam, at the height examined. What is the height of this tower?

The height of the Nextel Fire Tower is 73 feet. A plot is attached.

7. Are there any additional photos of the balloon fly conducted to prepare the visibility analysis? If so, please submit.

There are not any additional photos of the balloon float.

8. The visibility analysis states nine residences would have year-round views of the proposed tower – identify the location of these residences (by street).

Five of the nine residential properties that VHB believes will have views of the proposed Facility are located along Saybrook Road (Route 154); three properties are located along a private road/driveway located north of Saybrook Road; and one property is located off Gulf Quarry Road.

9. Would blasting be required for the construction of the proposed site?

No.

10. How many residences are within a 1,000-foot radius of the proposed tower?

There are no residences within a 1,000-foot radius of the proposed tower.

11. What is the distance and direction of the nearest residence to the proposed site?

The distance to the nearest residence is approximately 1,600 feet away from the proposed site in a northerly direction.

12. Does Sprint or CL&P currently use fuel cells as back up generators at any of its Connecticut tower sites? If yes, identify such sites.

Neither Sprint nor CL&P currently employ fuel cells as back-up generators at any of their telecommunications tower sites.

In Siting Council Petition No. 707, the Council granted Nextel Communications of the Mid-Atlantic, Inc. permission to install a 5kW fuel cell system at 188 Moody Road, Enfield, Connecticut. This project was never completed.

13. Does Sprint or CL&P plan to use a fuel cell at the proposed site or have any plans to install a fuel cell at any existing or future sites?

CL&P does not plan to utilize fuel cells as back-up generators at any of its telecommunications tower sites at this time.

To date, Sprint has implemented approximately 200 fuel cells nation wide and is currently evaluating fuel cells as a means of secondary power in Connecticut. Specifically, Sprint is researching issues related to the implementation of fuel cells such as the availability of hydrogen suppliers that are willing to install, refill and perform leak tests on the fuel cells.

14. How many antennas would CSP and CL&P install at the site? Are all of these antennas accounted for in the power density analysis included in Application Attachment 15?

CSP will install 4 antennas on the tower. Of these 4 antennas, only two will initially be active, one for transmitting and one for receiving. The other two CSP antennas are reserved for use in the event of a failure of one of the active antennas. The CSP transmitting antenna is included in the power-density analysis included under Tab 15 of the Application.

CL&P will install 8 antennas on the tower. Of these 8 antennas, one is used only for receiving. CL&P's 7 remaining antennas are included in the power-density analysis included under Tab 15 of the Application.

15. Was an airspace safety analysis performed for the tower? If so, please provide. If not, why not?

Sprint is researching the answer to this question and will forward it to the Council as soon as it is available.

Respectfully submitted by,

Sprint Nextel Corporation

&

The Connecticut Light & Power Company

By: 

Thomas J. Regan

Brown Rudnick Berlack Israels LLP

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Via First Class Mail

December 14, 2007

CT Yankee Atomic Power Co.
362 Injun Hollow Road
Haddam Neck, CT 06424

RE: Notice to Abutting Landowners

Dear Sir or Madam:

On October 22, 2007, Sprint Nextel Corporation and the Connecticut Light and Power Company (CL&P) (collectively the "Applicants") filed an application for a Certificate of Environmental Compatibility and Public Need with the Connecticut Siting Council for the construction, maintenance and operation of a 180-foot telecommunications tower on property owned by CL&P off of Cove Road in Haddam, Connecticut (Map 27, Lots 10 & 12A). The proposed tower will replace a fallen CL&P tower that used to stand at the site.

Originally, as an abutting property owner, you received notice of this filing in March. Pursuant to a recent request from the Siting Council, you are being given this additional notice to inform you of the public hearing on the application. The public hearing will be held Thursday, January 17, 2008 at the Haddam Town Hall beginning at 3:00 p.m. and continuing at 7:00 p.m. The public will be allowed to speak at the beginning of the 7:00 p.m. hearing. Prior to the public hearing there will be a public field review at the site beginning at 2:00 p.m. The Applicants will also fly a balloon on the day of the public hearing to simulate the height of the tower. Enclosed is a copy of the hearing notice that is being published in the local papers by the Siting Council.

A copy of the application is on file at the Haddam Town Hall (30 Field Park Drive) and the Siting Council (10 Franklin Square, New Britain) for your review. In addition, the application can be viewed on the Siting Council's website www.ct.gov/csc (go to "pending proceedings" on the left hand side, and then click on Docket No. 348).

If you have any questions, please contact me at (860) 509-6522.

Very truly yours,

BROWN RUDNICK BERLACK ISRAELS LLP

By: 

Thomas J. Regan

Enclosure

40239664 v1 - MERCIECM - 080563/3235

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Via First Class Mail

December 14, 2007

Robert T. Johnson
92 Cove Road
Haddam Neck, CT 06424

RE: Notice to Abutting Landowners

Dear Mr. Johnson.:

On October 22, 2007, Sprint Nextel Corporation and the Connecticut Light and Power Company (CL&P) (collectively the "Applicants") filed an application for a Certificate of Environmental Compatibility and Public Need with the Connecticut Siting Council for the construction, maintenance and operation of a 180-foot telecommunications tower on property owned by CL&P off of Cove Road in Haddam, Connecticut (Map 27, Lots 10 & 12A). The proposed tower will replace a fallen CL&P tower that used to stand at the site.

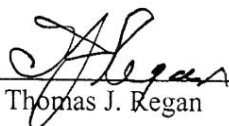
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Via First Class Mail

December 14, 2007

Andrew J. Egri
95 Cove Road
Haddam, CT 06424

RE: Notice to Abutting Landowners

Dear Mr. Egri:

On October 22, 2007, Sprint Nextel Corporation and the Connecticut Light and Power Company (CL&P) (collectively the "Applicants") filed an application for a Certificate of Environmental Compatibility and Public Need with the Connecticut Siting Council for the construction, maintenance and operation of a 180-foot telecommunications tower on property owned by CL&P off of Cove Road in Haddam, Connecticut (Map 27, Lots 10 & 12A). The proposed tower will replace a fallen CL&P tower that used to stand at the site.

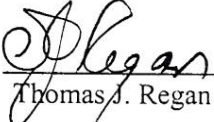
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Via First Class Mail

December 14, 2007

Stanford H. Brainerd
282 Quarry Hill Road
East Hampton, CT 06424

RE: Notice to Abutting Landowners

Dear Mr. Brainerd:

On October 22, 2007, Sprint Nextel Corporation and the Connecticut Light and Power Company (CL&P) (collectively the "Applicants") filed an application for a Certificate of Environmental Compatibility and Public Need with the Connecticut Siting Council for the construction, maintenance and operation of a 180-foot telecommunications tower on property owned by CL&P off of Cove Road in Haddam, Connecticut (Map 27, Lots 10 & 12A). The proposed tower will replace a fallen CL&P tower that used to stand at the site.

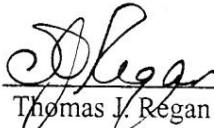
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Very truly yours,

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Thomas J. Regan

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Via First Class Mail

December 14, 2007

Connecticut Light & Power Co.
P.O. Box 270
Hartford, CT 06141-0270

RE: Notice to Abutting Landowners

Dear Sir or Madam:

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Via First Class Mail

December 14, 2007

Carmella M. Sogge
Richard G. Sogge
P.O. Box 368
Ross, CA 94957-0368

RE: Notice to Abutting Landowners

Dear Mr. Sogge and Ms. Sogge:

On October 22, 2007, Sprint Nextel Corporation and the Connecticut Light and Power Company (CL&P) (collectively the "Applicants") filed an application for a Certificate of Environmental Compatibility and Public Need with the Connecticut Siting Council for the construction, maintenance and operation of a 180-foot telecommunications tower on property owned by CL&P off of Cove Road in Haddam, Connecticut (Map 27, Lots 10 & 12A). The proposed tower will replace a fallen CL&P tower that used to stand at the site.


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