

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
: :  
APPLICATION OF MCF COMMUNICATIONS : DOCKET NO. 358  
bg, INC. AND CELLCO PARTNERSHIP 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 IN THE : :  
TOWN OF THOMPSON, CONNECTICUT : JUNE 3, 2008

APPLICANTS' RESPONSES TO PRE-HEARING QUESTIONS  
FROM THE THOMPSON HILLS WEST CONDOMINIUM ASSOCIATION

On Tuesday, May 27, 2008, the Applicants, MCF Communications bg, Inc. ("MCF") and Cellco Partnership d/b/a Verizon Wireless ("Cellco") (collectively the "Applicants"), received pre-hearing questions from the intervenor, Thompson Hills West Condominium Association (the "Association") regarding the above-captioned matter. Many of these questions relate specifically to MCF's prior dealings with the Association and its representatives between 2000 and 2003. While we question the relevance of some of the requested information, we have attempted to respond to these questions by providing the Connecticut Siting Council (the "Council") with a brief history and time line for MCF's prior dealings with the Association. This historical summary of events is intended to be responsive, in whole or in part, to Questions 1, 2, 8, 9 and 17. Responses to the remaining questions are also provided below.

Thompson Site Search History

MCF began searching for a site in the North Grosvenordale section of the Town of Thompson in approximately the year 2000. At that time, MCF was working with Nextel

Communications as a carrier interested in providing coverage to the area. The Association property, located to the north of the Docket No. 358 Site B tower location, was one of several properties investigated by MCF during the initial site search. As stated in the application and in the Applicants' responses to Council interrogatories, MCF signed a lease agreement with the Association in October of 2000. By its terms, the lease would expire if MCF did not obtain all necessary permits for the construction of a tower within three years. Following the signing of the lease, MCF began its standard due diligence and site investigations including title, engineering and environmental reviews. None of these reviews got very far due principally to the fact that shortly after signing the lease, Nextel Communications informed MCF that it was no longer interested in a tower site in the North Grosvenordale area. The exact reason why Nextel withdrew is unclear. At approximately the same time, MCF was also pursuing alternative cell sites including the properties where the proposed Site A and Site B facilities are currently proposed.

Throughout its dealings with the Association, MCF was instructed to work with the Association's Managing Agent, Deborah Kirk Connell. In late 2003, when it became clear that MCF would not have all necessary permits to build a tower site on the Association property, MCF contacted Ms. Connell in an effort to extend the lease agreement for the Association property. MCF was informed that the Association was not interested in extending the lease. At that point MCF had leases for tower sites at both the Site A and Site B properties, but no wireless carriers were interested in either site.

As discussed in the application and in interrogatory responses to the Council, Cellco commenced its site search for a tower location in the North Grosvenordale area on June 30, 2005. Cellco had been working with MCF on other tower sites in the area and was made aware of the

lease agreements for the Site A and Site B locations. At that time Cellco had been pursuing an opportunity for a third tower location on property at the Marianapolis School. Cellco proceeded with its lease, title, engineering and environmental reviews for the Marianapolis School property for approximately a year and a half. Environmental reviews of the Marianapolis School continued through the end of 2007. Cellco rejected the Marianapolis School site in early 2008 and commenced the local input process with MCF on December 7, 2007. The Docket No. 358 application was filed with the Council on February 22, 2008.

Brad Gannon with MCF will be presented as a witness to the Council at the hearing scheduled for June 10, 2008, and will be available to answer any additional questions you have regarding MCF's site search process and his discussions regarding the use of the Association's property.

Response to Question No. 3

The Applicant interpreted the Council's Question No. 13 to mean views from inside each of the condominium units. It is unclear whether the Association's statement regarding views of the Site B tower from the front of each individual unit is accurate. Intervening trees, buildings and other natural and man-made features on the Association's property may obstruct views from the outside of individual condominium units.

Response to Question No. 4

The Town of Thompson was presented, in accordance with the Council's procedures, with three alternative cell sites (Site A, Site B and the Marianapolis School) during the Applicant's initial local contact on December 7, 2007. Later discussions with the Planning and Zoning Commission ("PZC") focused exclusively on Sites A and B. By the time the Applicant met with the PZC, Cellco had withdrawn the Marianapolis School from further consideration.

The Town of Thompson First Selectman and the PZC never made any comments nor conveyed any opinions as to a cell site at the Association's property.

Response to Question No. 6

Cellco does not have enough information regarding the Association property to make a determination as to whether it would be the "preferred location". As discussed further below, Cellco's preferred tower location is Site A, primarily because that facility is located in a commercial zone, the parcel and surrounding parcels are developed with commercial and industrial land uses, with limited visual impact on nearby residential areas.

Response to Questions No. 7

See Applicant's Response to Council Interrogatory No. 8.

Response to Question No. 8

This question contains a number of speculative statements regarding the Association property and its ability to satisfy Cellco's coverage needs. Again, Cellco was not presented with the Association property as an alternative and has not investigated whether the site could satisfy its objectives in the area. Further, neither MCF nor Cellco have completed a visual impact assessment, environmental reviews, or title work for a speculative site on the Association's property. We are, therefore, unable to comment on whether or not a site at the Association property would be a "preferred location".

Response to Question No. 10

Again, neither MCF nor Cellco have adequate information on the speculative cell site on the Association property to adequately compare it to the proposed Site A and Site B tower locations. Generally speaking and consistent with comments received from the Thompson PZC, Site A would still be preferred over a site on the Association's property. The Association

property is zoned residential and surrounded by more residential uses than Site A.

Response to Question No. 11

Information regarding the amount of rent received pursuant to a lease agreement is proprietary information.

Response to Question No. 12

As stated above, neither First Selectman Larry Groh nor the PZC offered any opinion as to a potential cell site at the Association property.

Response to Question No. 13

Cellco prefers Site A due to its location in a commercial zone, on a developed parcel used for and surrounded by commercial and industrial purposes. Construction of the Site A facility would also have little or no physical environmental impacts (e.g. tree removal, significant regrading, etc.) on the property. Visual impact at the Site A tower is minimal and the Site A tower would have less overall impacts on surrounding residences.

Response to Question No. 14

Due simply to the fact that it is proposed to be developed on an adjacent parcel, and Site A is located approximately ½ mile to the south, the Applicant presumes that the Site B tower location would have more of an impact on the Association property than Site A. Other than comments from the Association, neither MCF nor Cellco has received any comments or objections from neighbors at either the Site A or Site B locations.

Response to Question No. 16


Higher ground elevation is only one of several factors that must be considered when selecting a cell site. Cellco does not have any information regarding environmental effects, visibility, etc. to make a determination as to whether the Association property would be an acceptable alternative location.

11/15/2011 10:00:00 AM

CERTIFICATE OF SERVICE

I hereby certify that on the 3<sup>rd</sup> day of June, 2008, a copy of the foregoing was mailed,  
postage prepaid, to:

Richard W. Thunberg, Jr.  
Board President  
Thompson Hills West Condominium Association  
Board of Trustee's  
13 Westside Drive, Suite 92  
North Grosvenordale, CT 06255



Kenneth C. Baldwin