

APPLICATION OF NEW CINGULAR
WIRELESS PCS, LLC (AT&T) FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE
AND OPERATION OF A
TELECOMMUNICATIONS TOWER
FACILITY AT ST. MATTHEW LUTHERAN
CHURCH AT 224 LOVELY STREET IN THE
TOWN OF AVON

DOCKET NO. 373

MARCH 24, 2009

PRE-FILED TESTIMONY
OF
KEVIN DEY

1.Q. Mr. Dey, please summarize your professional background and role for AT&T.

A. I am a consultant for SAI, a company hired by AT&T to acquire wireless telecommunications sites. My current responsibilities include identifying and selecting sites for AT&T in the areas where AT&T has gaps in coverage. Once sites have been identified, I handle lease negotiations and siting issues to secure sites for AT&T to improve and enhance its service. My resume is attached which details my qualifications and prior experience in the field.

2.Q. What is the purpose of your testimony?

A. The purpose of this testimony is to provide additional background information relating to the Application of New Cingular Wireless PCS, LLC ("AT&T") to the Connecticut Siting Council for a Certificate of Environmental Compatibility and Public Need for the proposed facility in Avon. Specifically, I am providing additional information regarding AT&T's site search and communications with various Town Officials and property owners regarding the proposed tower facility at St. Matthew's Lutheran Church on Lovely Street in Avon.

3.Q. What if any unique characteristics are associated with the AT&T site search area in Avon and the tower facility proposed at the Church?

A. This area of Avon is predominated by a north/south valley and significant ridgelines to the east and west. Route 177 (Lovely Street) runs along the valley floor. In conducting the site search in consultation with AT&T's radiofrequency engineers, it became apparent that a shorter tower on the valley floor was going to be required to generate coverage in the area where AT&T's network is currently deficient. AT&T's existing network sites are on the other side of the ridges, along Route 44 to the north and simply do not get coverage into the valley along Route 177. As such, AT&T's engineers confirmed that ridgeline locations or other areas that I presented them with were simply

not viable from a network integration and/or coverage standpoint. As such, I focused on larger parcels in the valley.

4.Q. Did you speak with Town Officials prior to and subsequent to the filing of the Application?

A. Yes. I have spoken primarily with the Town Manager and the Town Planner at three distinct periods of time over the course of the past year. First, I consulted with each of them prior to AT&T entering into a lease with the Church and as part of AT&T's search for a site in this area of Avon. Second, I was present at the Planning & Zoning Commission meeting in November of 2008 as part of the technical consultation process administered by the Town in response to AT&T's technical report filing and had various other conversations with Town Officials during that time period. Third, I also communicated with Town Officials subsequent to the filing of AT&T's formal Siting Council Application including a site visit to the Church with the Town Planner to evaluate the church building with our engineers and explain why a steeple would not be a feasible siting solution.

5.Q. Have you spoken with residents in the area regarding the AT&T Application?

A. Yes. When notices were mailed to abutting property owners of AT&T's intent to formally file this Application, I was contacted by Mr. Peter Wiese who lives on Greenwood Land and our counsel was contacted by another neighbor, Ms. Grant who lives north of the Church. I personally spoke on the phone and met Mr. Wiese at his office on more than one occasion and Ms. Grant at her place of employment. In both cases, we went over the project in detail. I gave both parties my business card and told them that if they or any neighbors had any questions to contact me. I was subsequently advised by our counsel that Mr. Wiese and Ms. Grant requested intervenor status in the Application. Later, Mr. Grant wrote to Michele Briggs, AT&T Site Development Manager in reference to concerns about the site and I was asked to contact him. I called Mr. Grant and left a message with my phone number. Others have called or written to AT&T and in each instance I followed up with a personal phone call.

6.Q. Has AT&T maintained open and ongoing communications with the Church and its representatives?

A. Yes. Since the filing of AT&T's Application, several residents have sought to engage the Church on its decision to lease property to AT&T. I and our counsel have continually communicated with Church officials to ensure that information and support was being provided by AT&T in order to address questions that might be answered by the Church in the event residents were not directly communicating with AT&T representatives.

CERTIFICATION OF SERVICE

I hereby certify that on this day, an original and twenty copies of the foregoing was served on the Connecticut Siting Council via electronic and overnight mail with a copy to:

Mr. Juan Fernandez
246 Lovely Street
Avon, CT 06001

Loni S. Gardner, Esq.
Murtha Cullina LLP
Two Whitney Avenue
PO Box 704
New Haven, CT 06503

Ms. Jane Garrett
15 Greenwood Drive
Avon, Connecticut 06001

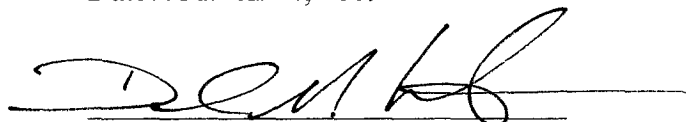
Carrie L. Larson, Esq.
Pullman & Comely, LLC
90 State House Square
Hartford, CT 06103-3702

Mr. & Mrs. Thomas & Patricia McMahon
21 Greenwood Drive
Avon, Connecticut 06001

Mr. & Mrs. Mark & Sheridan Toomey
9 Greenwood Drive
Avon, Connecticut 06001

Hon. Peter Emmett Wiese
240 Lovely Street
Avon, Connecticut 06001

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Daniel M. Laub
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
Attorneys for:
AT&T

cc: David Akerblom
John Blevins
Michele Briggs
Derek Creaser
Kevin Dey
Christopher B. Fisher, Esq