

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

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

NEW CINGULAR WIRELESS ("AT&T")
RESPONSES TO
SITING COUNCIL PRE-HEARING INTERROGATORIES (SECOND SET)

- Q1. Provide a diagram that depicts the site property in its entirety.
- A1. Attached as Exhibit A is a Locus Plan dated March 9, 2009 as prepared by Hudson Design Group which shows, the St. Matthew Lutheran Church site in its entirety as well as the relative location of roads, adjacent parcels and the approximate location of surrounding homes as obtained from the Town of Avon Tax Assessor's map and other records available on the Town of Avon Website. For the Council's convenience also attached in Exhibit A are various aerial photographs of the area.
- Q2. Is AT&T amenable to installing a monopole with a flush-mounted antenna design? Describe how a flush mount antenna design would affect coverage, future equipment needs, and potential tower sharing. Provide coverage plots if necessary.
- A2. Yes. At the proposed height of 100' a flush-mount design would require AT&T to place antennas at two heights along the top 20' portion of the tower. Flush mounting of antennas would severely limit opportunities for collocation at the proposed site as it would provide for only one remaining viable antenna location on the tower.
- Q3. Is the property owner amenable to installing the tower in other locations on the property? If so, identify these locations.

- A3. St. Matthew Lutheran Church (the "Church") is willing to consider alternate locations on the property. Nevertheless, through previous discussions with representatives of the Church at both the leasing stage and more recently, the proposed location is the Church's preferred location on the property. Alternate locations would have to be significantly setback further from the church building itself towards the parsonage and Roaring Brook which is located at the rear of the property. Such relocation options are limited given the potential for the church building to be expanded in the future, the proximity to Roaring Brook and a flood zone at the rear of the premises.
- Q4. Are there other towers or tall structures in the area (2 mile radius) that do not support AT&T's equipment? If so, please identify the structure, height of structure, address and structure location on a map.
- A4. AT&T's investigations identified no towers or tall structures within two miles of the proposed site which do not already support AT&T's equipment.
- Q5. What is the height of the existing church steeple? Was the existing steeple or an enlarged steeple considered for telecommunications use?
- A5. The existing church steeple rises to a overall height of 65'. Yes, the existing steeple or some enlarged version was investigated by AT&T's team as part of the initial site search process. AT&T also conducted further and subsequent evaluations as part of the application process which included Town representatives on site.

The existing steeple is too low to be used as a siting solution. Attached as Exhibit B, is a report from Hudson Design Group, the project engineers, indicating that three (3) close mounted antennas could only be accommodated within the existing structure at a height of 35' which is not technically viable for network coverage.

An expanded steeple, would at a minimum require a new radiofrequency ("RF") transparent material at least 95' in height in order to provide coverage from antennas at 80' and accommodate a steeple taper to 95' in height. This church's existing construction simply can not accommodate such a replacement or enlarged steeple as a structural matter. Such a structure would require the construction of a new support right through the middle of the sanctuary and altar within the church building. Not surprisingly, the Church has advised AT&T that it will not allow that type of construction on or in its building.

For a further discussion of "steeple", please also refer to the Applicant's responses to the Town of Avon's interrogatory # 13.

- Q6. Provide a Natural Diversity Database map for the site area.

- A6. Attached as Exhibit C is the State DEP's Natural Diversity Database Map for this area of the Town of Avon
- Q7. Provide the credentials of the professional that determined suitable habitat for the eastern box turtle is not present at the tower site.
- A7. Ottery Group prepared the NEPA review which is included in Exhibit 6 of the Application. Attached as Exhibit D are the credentials of the individuals responsible for that report. Ottery also consulted with a professional herpetologist, Charles H. Annicelli III with the firm of Herpetological Surveys, LLC. Further, on-site assessments of the tower site location were recently done by Mr. Annicelli and he has determined that the tower site is not habitat for the Eastern Box Turtle as also enclosed in Exhibit D.

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:

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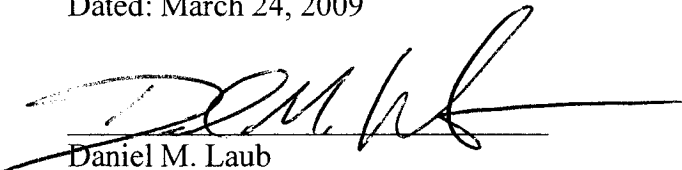
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Dated: March 24, 2009


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