

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
 APPLICATION OF SBA TOWERS II, LLC FOR : DOCKET NO. 378
 A CERTIFICATE OF ENVIRONMENTAL :
 COMPATIBILITY AND PUBLIC NEED FOR :
 THE CONSTRUCTION, MAINTENANCE AND :
 OPERATION OF A TELECOMMUNICATIONS :
 FACILITY OFF RABBIT HILL ROAD, :
 WARREN, CONNECTICUT : MARCH 23, 2009

PETITION TO INTERVENE

Pursuant to Connecticut General Statutes (“C.G.S.”) Section 16-50n and Regulations of Connecticut State Agencies (“R.C.S.A.”) Section 16-50j-15a, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby requests permission of the Siting Council (“Council”) to participate, as an intervenor in the application and hearing process for Docket No. 378.

As the Council is aware, Cellco is a licensed provider of wireless services in Litchfield County, Connecticut. The Site A tower proposed in Docket No. 378 fits neatly into Cellco’s network design for Litchfield County and will provide coverage between its existing Washington North and Litchfield Southwest cell sites. Cellco may therefore be significantly affected by this proceeding. Cellco cannot satisfy its coverage objectives and, therefore, is not interested in the Site B tower location proposed in Docket No. 378.

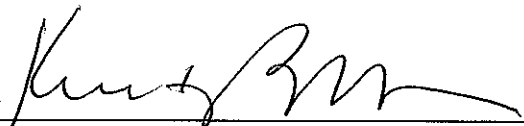
In addition, Cellco has an interest in the hearing and in the pre-hearing process to aid the Council in evaluating the public interest and need considerations set forth in C.G.S. § 16-50g. Cellco’s expertise and experience in designing, constructing, operating and maintaining a wireless telecommunications system in the State of Connecticut in accordance with the rules and

regulations of the Council, the Department of Public Utility Control and the Federal Communications Commission, may be of benefit to the Council in resolving issues presented in Docket No. 378. Cellco has been admitted as an intervenor in prior Siting Council dockets. Cellco proposes to participate in the hearing by cross-examining the Applicant's witnesses, offering oral and written testimony or evidence and filing pre-hearing interrogatories.

For the above-stated reasons, Cellco seeks permission to participate in this docket as an intervenor.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By 

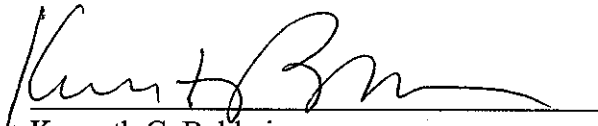
Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
(860) 275-8200
Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of March, 2009, a copy of the foregoing was sent,
postage prepaid, to:

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

Christopher B. Fisher, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601


Kenneth C. Baldwin