# 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

# CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS SITE JUSTIFICATION STATEMENT

## **INTRODUCTION**

Cellco Partnership d/b/a Verizon Wireless ("Cellco") seeks intervenor status in Connecticut Siting Council Docket No. 378, an application by SBA Towers II, LLC ("SBA"). In this docket, SBA seeks Council approval to construct a telecommunications tower at one of two alternative locations on a 106-acre parcel off Rabbit Hill Road in Warren, Connecticut (the "Property"). The first alternative location ("Site A") is located in the southwesterly portion of the Property. At Site A, SBA would construct a 160-foot monopole tower within a 60' x 60' compound. As described in more detail below, Cellco's proposed use of the Site A facility will involve the installation of up to 15 antennas at the 147-foot level on the 160-foot tower and the installation of a 12' x 30' shelter near the base of the tower. Cellco cannot satisfy its coverage objectives at the Site B location described in the Docket No. 378 application.

#### THE INTERVENOR

Cellco is a Delaware partnership with an administrative office located at 99 East River Drive, East Hartford, Connecticut 06108. Cellco is licensed by the Federal Communications

Commission ("FCC") to operate a wireless system in the cellular, PCS and 700 MHz frequency ranges throughout Litchfield County, Connecticut within the meaning of Conn. Gen. Stat. § 16-50i(a)(6). Operation of a wireless telecommunications system and related activities are Cellco's sole business in the State of Connecticut. Cellco has extensive national experience in the development, construction and operation of wireless telecommunications systems and the provision of wireless telecommunications service to the public.

## NEED

In the Washington/Warren area, Cellco's network currently experiences significant gaps in coverage, at both cellular and PCS frequencies, along New Milford Turnpike (Route 202) as well as local roads in northeast portions of Washington and southeast portions of Warren, Connecticut. See Existing Cellular and PCS Coverage Maps included behind Attachment 1. As depicted on these maps, Cellco maintains a 2.9 mile coverage gap along Route 202 at cellular frequencies and a 4.0 mile coverage gap along Route 202 at PCS frequencies. With antennas at the 147-foot level on the Site A tower, Cellco can provide reliable coverage along Route 202 between its existing Washington North cell site at 6 Mountain Road in Washington and its Litchfield Southwest cell site at 1291-1293 Bantam Road in Litchfield, Connecticut. See Composite Coverage Maps included in Attachment 2. Cellco cannot satisfy its coverage objective along Route 202 from the Site B location.

## CELL SITE EQUIPMENT

Cellco would install up to fifteen (15) panel-type directional antennas at the 147-foot level on the proposed Site A tower. Cellco would also install a 12' x 30' single-story equipment shelter near the base of the tower to house Cellco's receiving, transmitting, switching, processing and performance monitoring equipment and the required heating and cooling equipment. Cellco

would also install a back-up generator inside its equipment shelter for use during power outages and periodically for maintenance purposes.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

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 23<sup>rd</sup> 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







