

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
 :  
 APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 382  
 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 OFF :  
 LANE STREET, SHELTON, CONNECTICUT : SEPTEMBER 15, 2009

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS  
TO CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES

On August 31, 2009, the Connecticut Siting Council (“Council”) issued Pre-Hearing Interrogatories to the Applicant, Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to the above-captioned docket. Below are Cellco’s responses.

Question No. 1

Did Cellco receive return receipts for all adjacent landowners listed in Application Attachment 5? If not, list the abutters that did not receive notice and describe any additional effort to serve notice.

Response

Cellco send out a total of 494 certified letters to abutters of the Harry B. Brownson Country Club property. Many of the abutters listed in the application are Aspetuck Village Condominium unit owners. Aspetuck Village is located to the north and east of the southerly portion of the Country Club parcel. (See Site Plan/Abutters Map, Sheet C-1, behind Tab 1 of the Application).

Sixty-five of the certified letters were returned mark either “Unclaimed” “Rejected” or “Return to Sender – Unable to Forward”. “Green Cards” for one of the abutters’ letters was not returned at all (owners listed as Michael and Connie Howley). The letters marked “unclaimed” and “rejected” were sent out to the listed abutters, a second time, by regular mail. For those letters marked “Return to Sender – Unable to Forward” Cellco reviewed Shelton Tax Assessor’s records to confirm that the ownership information included in the application was correct. In one case, for abutter Mary-Joan Donahue at 30 Philip Drive, the listed owner was the same but the owner’s mailing address had changed. In that instance, the notice letter was resent to Ms. Donahue at her new address. In all other cases, the ownership information in the Tax Assessor’s records matched that contained in the Cellco application. The remaining notice letters were resent to these owners at the same address by regular mail.

Question No. 2

What tower height was considered at the rejected Brownson Country Club clubhouse location?

Response

As described in the application, the location considered near the clubhouse was rejected due to its proximity to residential areas and the lack of natural screening on the northerly portion of the Country Club’s property. (See Aerial Photograph p. iii of the Application). That said, Cellco would need a tower height of 170 feet near the clubhouse to satisfy its coverage objectives in the Huntington area.

Question No. 3

What tower height was considered at the rejected Brownson Country Club site near the 11<sup>th</sup> green? Describe the “significant impacts to wetlands” in this location.

Response

The ground elevation behind the 11<sup>th</sup> green is about the same as the proposed tower location to the south. A tower height of 120 feet would be needed at this location to satisfy Cellco’s coverage objectives.

Dean Gustafson with VHB, Inc. completed a site investigation and found that wetland areas surround the 11<sup>th</sup> green to the north, east and west. The proposed Cellco telecommunications facility is located south of the 11<sup>th</sup> green. Two forested wetland corridors flow from the north towards the 11<sup>th</sup> Green along the north and east sides of the green. The wetland systems consist primarily of mature forested wetland habitats associated with seasonal intermittent watercourses. The two wetland corridors combine along the west side of the green and flow to the southwest between the 11<sup>th</sup> and 16<sup>th</sup> Fairways and into an irrigation pond. Therefore, due to the location of these adjoining wetland resources and their extent, development of a wireless telecommunications facility in this area would result in a significant impact to wetlands.

Question No. 4

What were the steeple heights considered at the St. Paul’s Church and Huntington Congregational Church? Was a replacement steeple considered at either location? If not, why not?

Response

VHB surveyed the steeple heights of both the St. Paul's Episcopal Church and Huntington Congregational Church using a Suunto Tandem clinometer. The top of the steeple at the St. Paul's Episcopal Church was found to be approximately 60 feet tall. The top of the steeple at the Huntington Congregational Church was measured to be approximately 65 feet tall.

Cellco determined that an antenna height of 110' above ground level would be required at both the St. Paul's Church and Huntington Congregational Church locations to satisfy its coverage objectives in the Huntington area. A steeple replacement at either church location, therefore, would require a significant extension, almost doubling the height, of either steeple. It has been Cellco's experience that such a significant alterations to historic buildings or buildings contributing to a Historic District (both church buildings are located in the Huntington Center Historic District) would result in a finding of "adverse effect" on historic architectural resources from the Connecticut State Historic Preservation Officer (SHPO).

Question No. 5

Would blasting be required for the construction of the proposed site? Provide estimates of cut and fill.

Response

Cellco does not anticipate a need for blasting to construct the proposed facility. A complete geo-technical survey will be completed and submitted to the Council as a part of the D&M Plan, if the Huntington cell site is approved. Grading to construct the Huntington cell site would be minimal and involve a cut of 330 cubic yards and a fill of 315 cubic yards, for a net cut

of 15 cubic yards.

Question No. 6

Identify the limits of the Huntington Center Historic District.

Response

The limits of the Huntington Center Historic District is shown on the area map include in Attachment 1.

Question No. 7

Why was access to the site changed from Old Pent Road to Lane Street?

Response

Old Pent Road is identified on maps and in documents found in the Shelton Land Records as an "Ancient Highway". The southerly portion of Old Pent Road, between Lane Street and the Brownson Country Club property is used as the driveway by at least one adjacent residential parcel owned by Linda Cwanek, at 64 Lane Street. (Ms. Cwanek owns the property at this address but lives in Woodbridge, Connecticut). At the public information hearing held on March 3, 2009 at the Shelton Community Center, Ms. Cwanek raised several concerns about the southerly portion of Old Pent Road, including its current deteriorated condition and the failure of the Town and/or the Country Club to maintain the driveway. Representatives of the Town and the Country Club have told Ms. Cwanek that neither owns nor is responsible for maintenance of the southerly portion of Old Pent Road. When she learned of Cellco's intent to use this same driveway for access to the proposed cell site, Ms. Cwanek became even more concerned. After the Public Information Meeting, Cellco offered to look further into the issue of ownership of Old Pent Road. Following an extensive review of title documents and historic mapping information

in the City's land records, Cellco's title searcher concluded that the Brownson Country Club has the right to use the southerly portion of Old Pent Road to access its property from Lane Street, but that neither the Country Club nor the Town held title to the southerly portion of Old Pent Road. Ownership of Old Pent Road could not be determined.

To alleviate Ms. Cwanek's concerns related to Cellco's proposed use of the existing driveway and to avoid the problems associated with the title (ownership) issues associated with this portion of Old Pent Road, Cellco amended its agreement with the Country Club and modified its plan for access to the Huntington cell site.

Question No. 8

What is Cellco's minimum signal level threshold for in-building and in-vehicle use?

Response

Cellco's coverage thresholds throughout its network are -85 dBm for in-vehicle service and -75 dBm for in-building service.

Question No. 9

Did Cellco perform a site drive test or base line drive test for the area? If yes, please provide.

Response

No.

Question No. 10

Provide coverage plots (PCS and cellular), using the scale and thresholds in Application Attachment 7, that depicts coverage from existing/approved Cellco sites and the proposed site at tower heights of 110 and 100 feet.

Response

The plots showing coverage from the proposed site at 110 feet are included in Attachment 2. Plots showing coverage from the proposed site at 100 feet are included in Attachment 3. In an effort to help the Council quantify the differences in coverage from the proposed site at the various heights discussed, Cellco offers the following additional information.

<u>Tower Height</u>	<u>Coverage Along Route 108</u>	<u>Overall Coverage Footprint</u>
120' (Proposed)	1.81 Miles (PCS) 2.63 Miles (Cellular)	2.7 Sq. Miles (PCS) 6.3 Sq. Miles (Cellular)
110'	1.68 Miles (PCS) 2.3 Miles (Cellular)	2.35 Sq. Miles (PCS) 5.6 Sq. Miles (Cellular)
100'	1.60 Miles (PCS) 2.05 Miles (Cellular)	2.1 Sq. Miles (PCS) 5.1 Sq. Miles (Cellular)

Question No. 11

Does Cellco currently use fuel cells as back up generators at any of its Connecticut tower sites? If yes, identify such sites?

Response

No.

Question No. 12

Does Cellco plan to use a fuel cell at the proposed site or have any plans to install a fuel cell at any existing or future sites in Connecticut?

Response

No.

Question No. 13

Did the town comment on the proposal during the municipal consultation process? If so, please provide or summarize.

Response

Cellco has not received any formal comments from the City of Shelton on the proposed Huntington Facility nor is it aware of any such comments being issued.

Question No. 14

Provide the methodology and input parameters used to obtain the power density figure presented on page 8 of Application Exhibit 1.

Response

The worst case power density calculations included in the applications utilizes the methodology prescribed in the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) and assumes that the Cellco's antennas are focused at a point on the ground near the base of the tower (120 feet below), and all antennas are transmitting simultaneously, on all channels, at full power.

Question No. 15

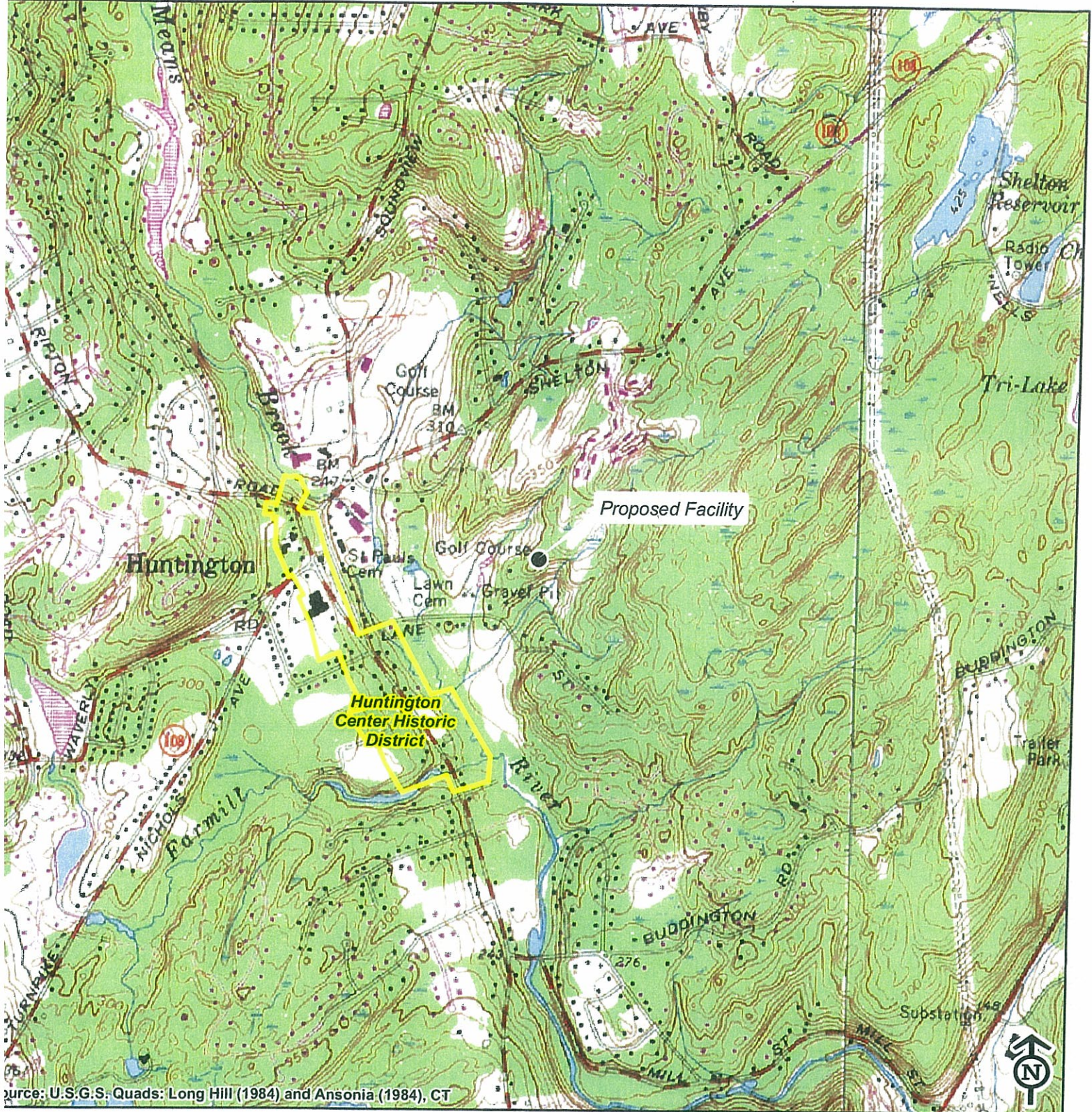
How was the FAA Summary Report in Application Exhibit 13 generated?

Response

For each proposed tower location, Cellco receives "2-C Certified" survey coordinates and ground elevation information from its project engineers. That information is plugged into a



FAA-approved computer program, licensed to Cellco that produces the Federal Airways & Airspace Summary Report included in the Docket No. 382 application behind Tab 13.



Source: U.S.G.S. Quads: Long Hill (1984) and Ansonia (1984), CT



Vanasse Hangen Brustlin, Inc.

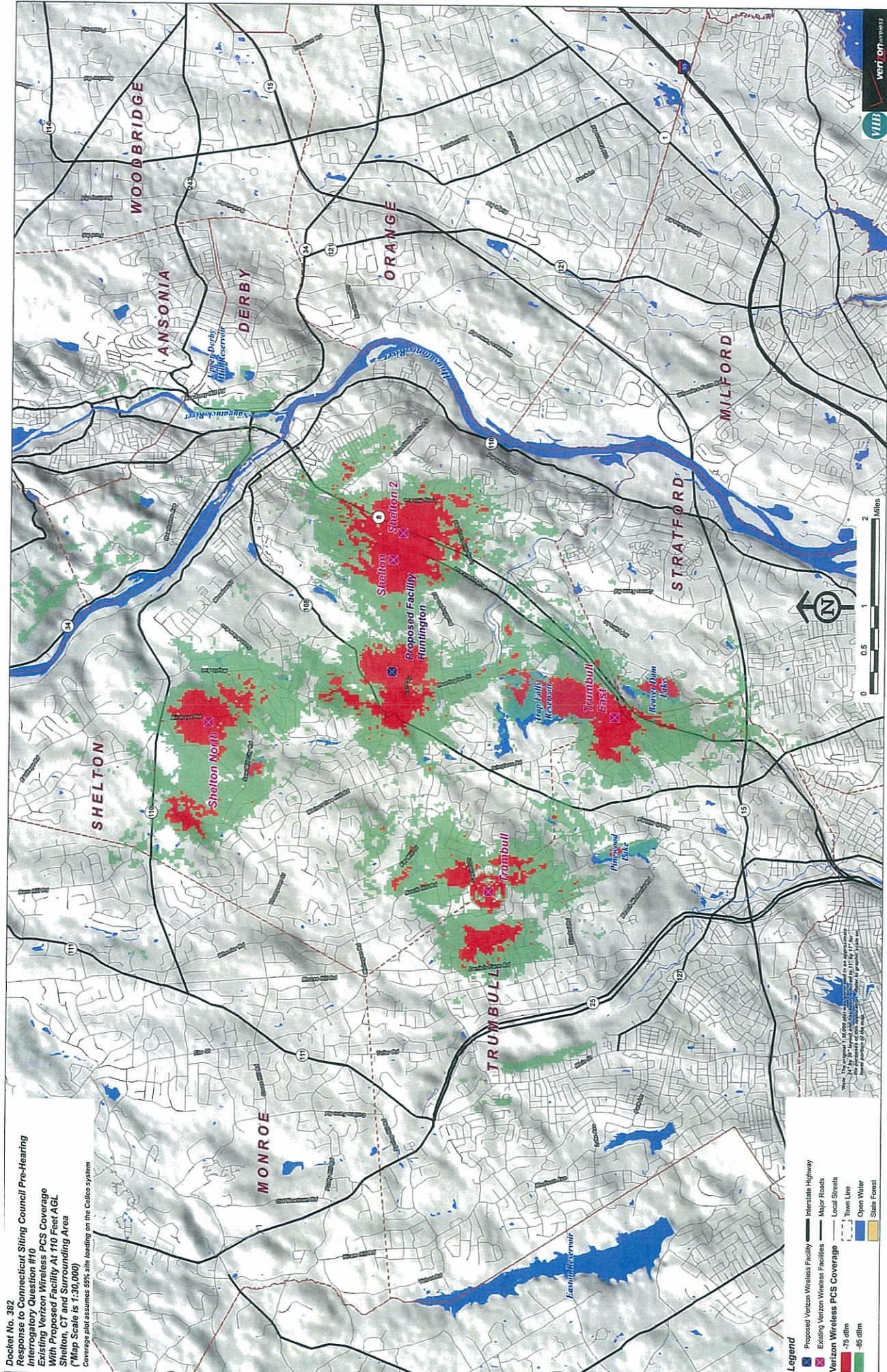
Proposed Facility

Huntington Center Historic District

Limits of Huntington Center  
 Historic District  
 Proposed Verizon Wireless Facility  
 Huntington  
 Lane Street  
 Shelton, Connecticut



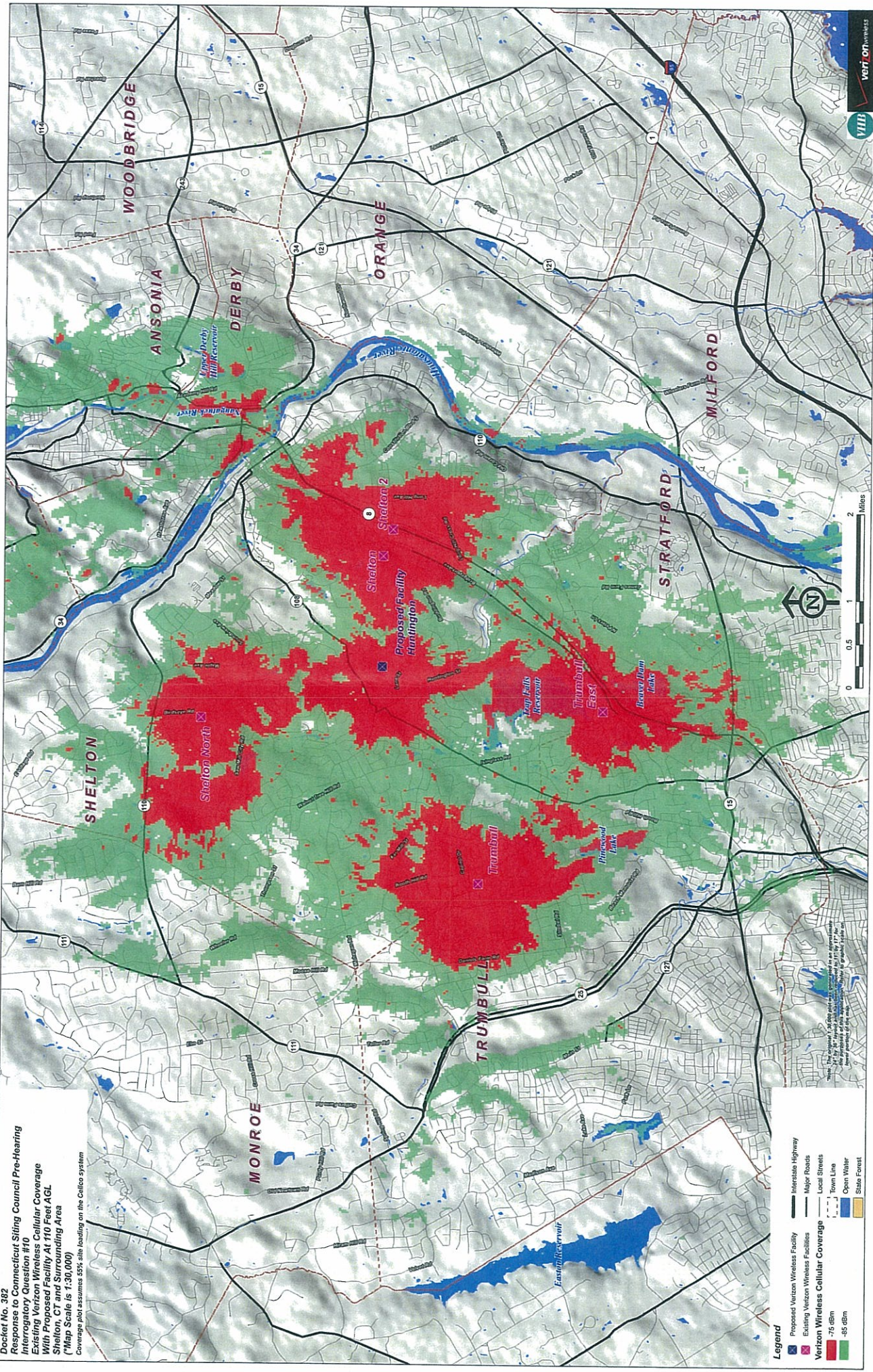
Docket No. 382  
 Responses to Connecticut Stating Council Pre-Hearing  
 Interrogatory Question #10  
 Existing Verizon Wireless PCS Coverage  
 With Proposed Facility At 110 Feet AGL  
 Shelton, CT and Surrounding Area  
 (Map Scale is 1:30,000)  
 Coverage plot assumes 55% site loading on the Celco system



Map prepared by the applicant. Coverage is generally based on  
 measurements taken at 110 feet AGL. Coverage is not intended to be  
 used for engineering purposes. Coverage is not intended to be used for  
 engineering purposes. Coverage is not intended to be used for engineering  
 purposes.

- Legend**
- Proposed Verizon Wireless Facility
  - Existing Verizon Wireless Facilities
  - Verizon Wireless PCS Coverage
  - 75 dBm
  - 85 dBm
  - Interstate Highway
  - Major Roads
  - Local Streets
  - Town Line
  - Open Water
  - State Forest

Doclet No. 382  
 Response to Connecticut Siting Council Pre-Hearing  
 Interrogatory Question #10  
 Existing Verizon Wireless Cellular Coverage  
 With Proposed Facility At 110 Feet AGL  
 Shelton, CT and Surrounding Area  
 (\*Map Scale is 1:30,000)  
 Coverage plot assumes 55% site loading on the Celco system

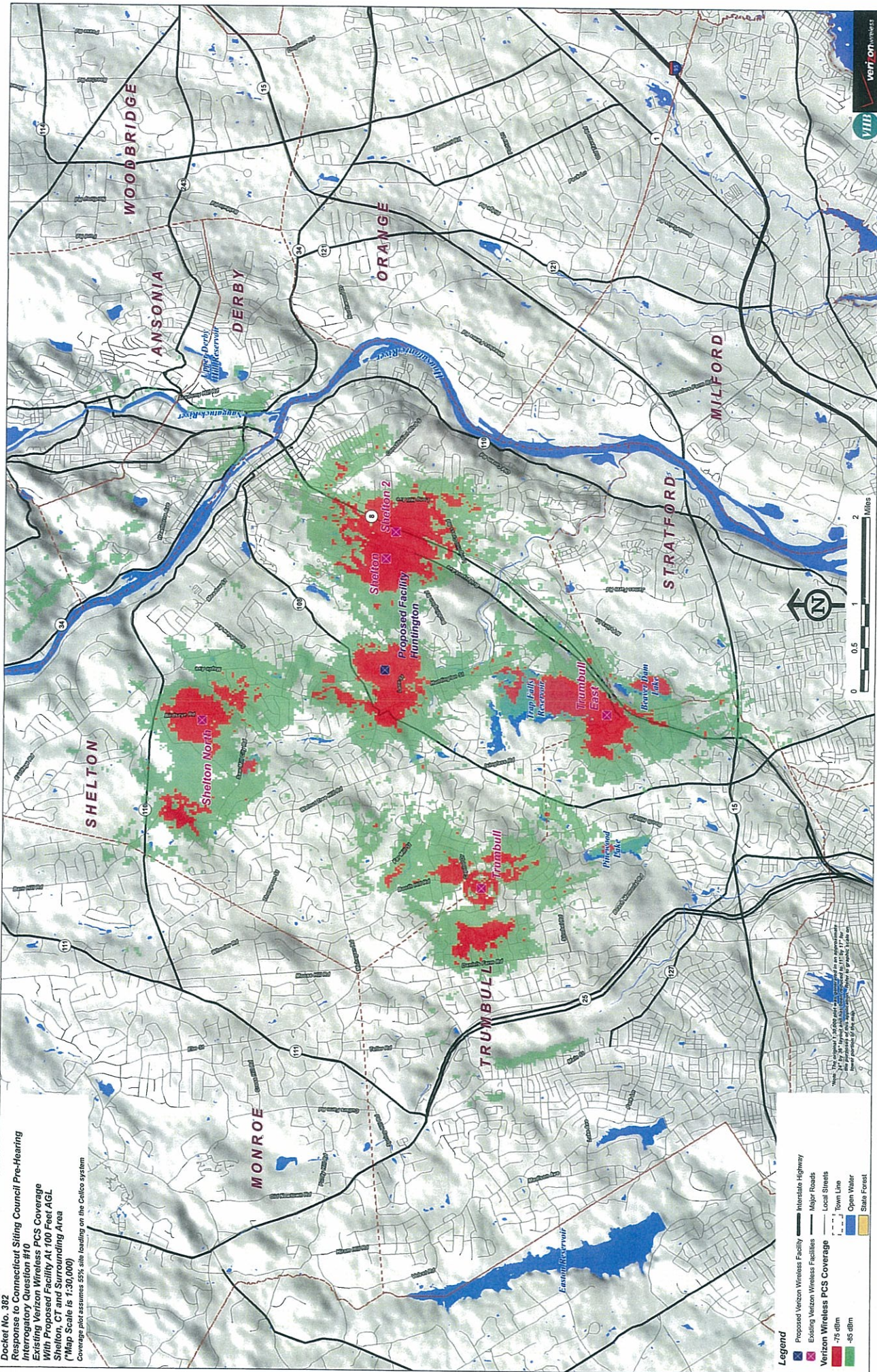


- Legend**
- Proposed Verizon Wireless Facility
  - Existing Verizon Wireless Facilities
  - Interstate Highway
  - Major Roads
  - Local Streets
  - Town Line
  - Open Water
  - State Forest
- Verizon Wireless Cellular Coverage**
- 75 dBm
  - 85 dBm

Note: This Coverage Plot is based on the Celco system. Coverage is shown for the proposed facility at 110 feet AGL. Coverage is shown for the existing facilities at 110 feet AGL. Coverage is shown for the existing facilities at 110 feet AGL. Coverage is shown for the existing facilities at 110 feet AGL.



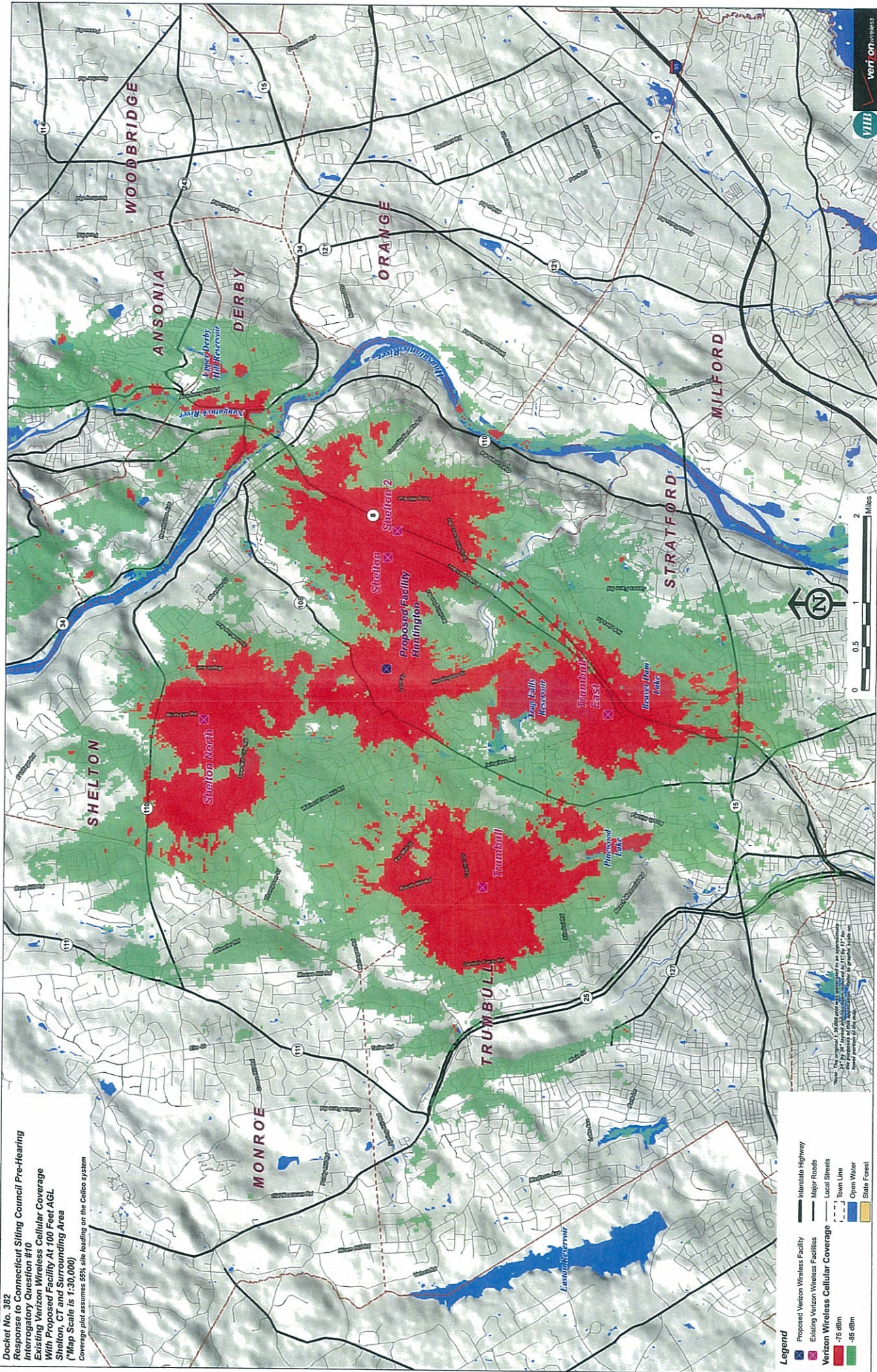
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 Existing Verizon Wireless PCS Coverage  
 With Proposed Facility At 100 Feet AGL  
 Shelton, CT and Surrounding Area  
 (\*Map Scale is 1:30,000)  
 Coverage not assumes 55% site loading on the Celio system



- Legend**
- Proposed Verizon Wireless Facility
  - Existing Verizon Wireless Facilities
  - Verizon Wireless PCS Coverage
  - 75 dBm
  - 85 dBm
  - Interstate Highway
  - Major Roads
  - Local Streets
  - Town Line
  - Open Water
  - State Forest



Map No. 247001001  
 This map was prepared for the purpose of showing the proposed location of the facility and the coverage area. It is not intended to be used for any other purpose. The coverage area is shown as a general guide only.



Docket No. 302  
 Response to Connecticut Siting Council Pre-Hearing  
 Regulatory Question #10  
 Existing Verizon Wireless Cellular Coverage  
 With Proposed Facility At 100 Feet AGL  
 Shelton, CT and Surrounding Area  
 (Map Scale is 1:30,000)  
 Coverage plot assumes 55% site loading on the Cellco system

- Legend**
- Proposed Verizon Wireless Facility
  - Existing Verizon Wireless Facilities
  - Verizon Wireless Cellular Coverage
  - 75 dBm
  - 85 dBm
  - Interstate Highway
  - Major Roads
  - Local Streets
  - Town Line
  - Open Water
  - State Forest



This coverage plot is for informational purposes only and does not constitute an offer of service. The actual coverage may vary based on the specific site location and other factors. Coverage is not guaranteed.