

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 316 PERKINS ROAD IN
THE TOWN OF SOUTHBURY

DOCKET NO. 383

March 29, 2010

**NEW CINGULAR WIRELESS PCS, LLC ("AT&T")
RESPONSES TO SITING COUNCIL
INTERROGATORIES FOR REOPENING**

At its February 11, 2010 meeting the Siting Council granted the motion of New Cingular Wireless PCS, LLC ("AT&T") to reopen the evidentiary hearing to further develop the record for the captioned docket. The Siting Council subsequently issued additional interrogatory questions for the re-opened hearing. Below and attached are AT&T's responses to same.

- Q1. Provide a map showing the specific location(s) in the western portion of the Southbury Training School property that AT&T's radio frequency engineers evaluated for a new tower.
- A1. Included as Attachment 1 please find the requested map.
- Q2. At what antenna height(s) was this location evaluated?
- A2. The locations were evaluated up to and beyond 200' AGL, the height at which lighting of a tower would be automatically required by FAA regulations. Propagation maps indicate that a facility at 350' at the western end of the Southbury Training School property would largely provide coverage for the objectives identified in this application. Notably though, even at 350' the coverage footprint, while large, does not extend north along South Street due to topography and accordingly does not achieve coverage similar to the site proposed.
- Q3. Provide propagation map(s), at the same scale of those provided in the original application, showing the predicted coverage from this location(s).
- A3. Included as Attachment 2 please find the requested propagation maps.

Q4. How many residences are within 1,000 feet of this location(s)?

A4. As noted in Attachment 3, residence counts would be as follows:

1. Location #1- 5 residences
2. Location #2- 9 residences
3. Location #3- 17 residences

Q5. Did AT&T discuss with the Training School leasing a portion of its property for a new tower site? If so, what were the results of these discussions?

A5. Yes. AT&T representatives called the Southbury Training School to ask about whether leasing a portion of the property for a new tower site would be feasible. Two calls were placed to the Training School: one on December 1, 2009 and one on December 18, 2009. No response was forthcoming from the Training School. In response to AT&T's December 18, 2009 call to the office of Eugene Harvey it was indicated that the question regarding leasing space on the western portion of the Training School was forwarded to the proper person and a call back to AT&T's representative would be forthcoming. No call was received.

Soon after this second call to Southbury Training School on December 18, 2009, AT&T's radio frequency engineers determined that no reasonable tower height/site in the western portion of the Southbury Training School Property would achieve the coverage objectives for the area. As such there was no additional follow-up with the Southbury Training School after December 18, 2009 and as noted no further calls or correspondence were received from the Training School indicating any interest in leasing space for a new tower facility.

Q6. Would a lower tower at the proposed site at 316 Perkins Road be able to provide the desired coverage in conjunction with a tower of a similar height at one of the following properties identified in the original application as Wolf #1 or #2, Weinstein #1 or #2, Hardy Farms Graham #1 or #2, or Agape Outreach Camp at 206 West Purchase Road (Map 3-90-10A)?

A6. No. Due to the topography of the area and the location of on-air as well as existing search areas and future proposed sites, lower towers at these two locations do not reach important parts of the coverage objective including points north along River Road or south along South Street. The sites noted in the question were in an area AT&T investigated initially as part of the initial search ring. As the Council will recall, Site 1860 in Newtown, which was approved in Docket 376, was initially a search area located further south in the Paugussett State Forest that was moved north due to the infeasibility of locating a telecommunications facility in a State Park. See, Administrative Notice List Item Number 16, State of Connecticut Department of Environmental Protection (DEP) letter to Christopher B. Fisher. The final approved site was north of that location and as such effects the nature of coverage need in this area of Southbury shifting the site further northeast from the original search ring location.

Tower sites at Wolf #1 or #2, Weinstein #1 or #2, Hardy Farms Graham #1 or #2, or Agape Outreach Camp at 120' AGL do not provide meaningful additional coverage along South Street or to the west. The Weinstein locations are approximately 1 mile from existing Site 1860. The Wolf locations are approximately 1 mile from the proposed site and do not provide significant additional coverage. The Graham locations do provide additional coverage to the immediate south but do not add coverage along South Street or other portions of the coverage objective. A site at the Agape Outreach Camp would strengthen the signal along South Street from in-vehicle to in-building. In summary, AT&T does not find that an additional tower at the noted locations would be warranted for coverage purposes.

As a matter of network design and build-out, it is important to note that AT&T is also now taking preliminary steps to utilize an existing State-owned tower location near the intersection of State Highway 133 and Route 67 (1252). Anticipated coverage from this location would provide some handoff with the proposed facility at 316 Perkins Road along the northern section of River Road. This site, in conjunction with another search ring to the west of 316 Perkins Road (2039), would provide coverage to a significant portion of the Route 133 corridor which is currently unserved.

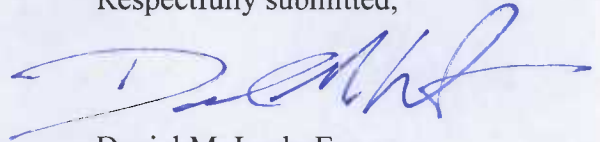
Site / Search Ring Number	Status	Details
1252	Existing Department of Transportation tower, Replacement tower site.	Candidate identified and process ongoing for proprietary approvals.
1876	New tower site.	Candidate property identified, technical consultation completed. Additional research, review and due diligence ongoing.
Site 1860	New tower site.	Building permit issued, construction about to commence.
2039	New tower site.	Candidate property identified, leasing process ongoing.

- Q7. What is the lowest height at which a tower at each of two locations—the location proposed in the application and a second location at one of the properties listed in the previous question—could achieve coverage acceptable to AT&T?
- A7. As noted in A6, the combination of topography, existing sites, and proposed sites severely limit the usefulness of a second tower location for AT&T. While in certain circumstances a “two site solution” works to achieve the coverage objectives, due to topography and the nature of the coverage objectives, a two site approach here proves

unwarranted as it would be either largely redundant or fail to provide service that would overlap with other proposed sites.

- Q8. If a two-tower configuration is capable of providing AT&T's desired coverage, provide a propagation map, at the same scale of those provided in the original application, showing the predicted coverage such a configuration would produce.
- A8. As noted in A6 and A7, a two-tower configuration is not capable of providing AT&T's needed coverage. Coverage maps depicting the coverage from the proposed site and the cited alternatives are provided in Attachment 4. These coverage maps assume two towers at 120' in height.

Respectfully submitted,

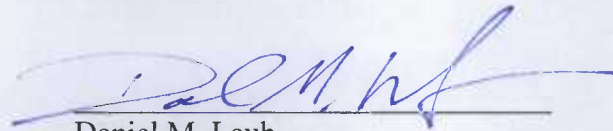
A handwritten signature in blue ink, appearing to read "D. Laub", is written over the typed name.

Daniel M. Laub, Esq.
Christopher B. Fisher, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
(914) 761-1300

CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and twenty (20) copies of the foregoing and attached was served on the Connecticut Siting Council by overnight delivery with copy also sent via electronic mail.

Dated: March 29, 2010



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

cc: Michele Briggs, AT&T
John Blevins, AT&T
Kevin Dey, SAI
Donald Ukers, Dewberry

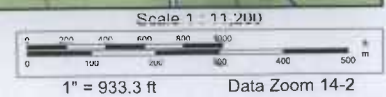
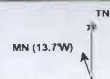
Southbury Training School Alternate Site Map



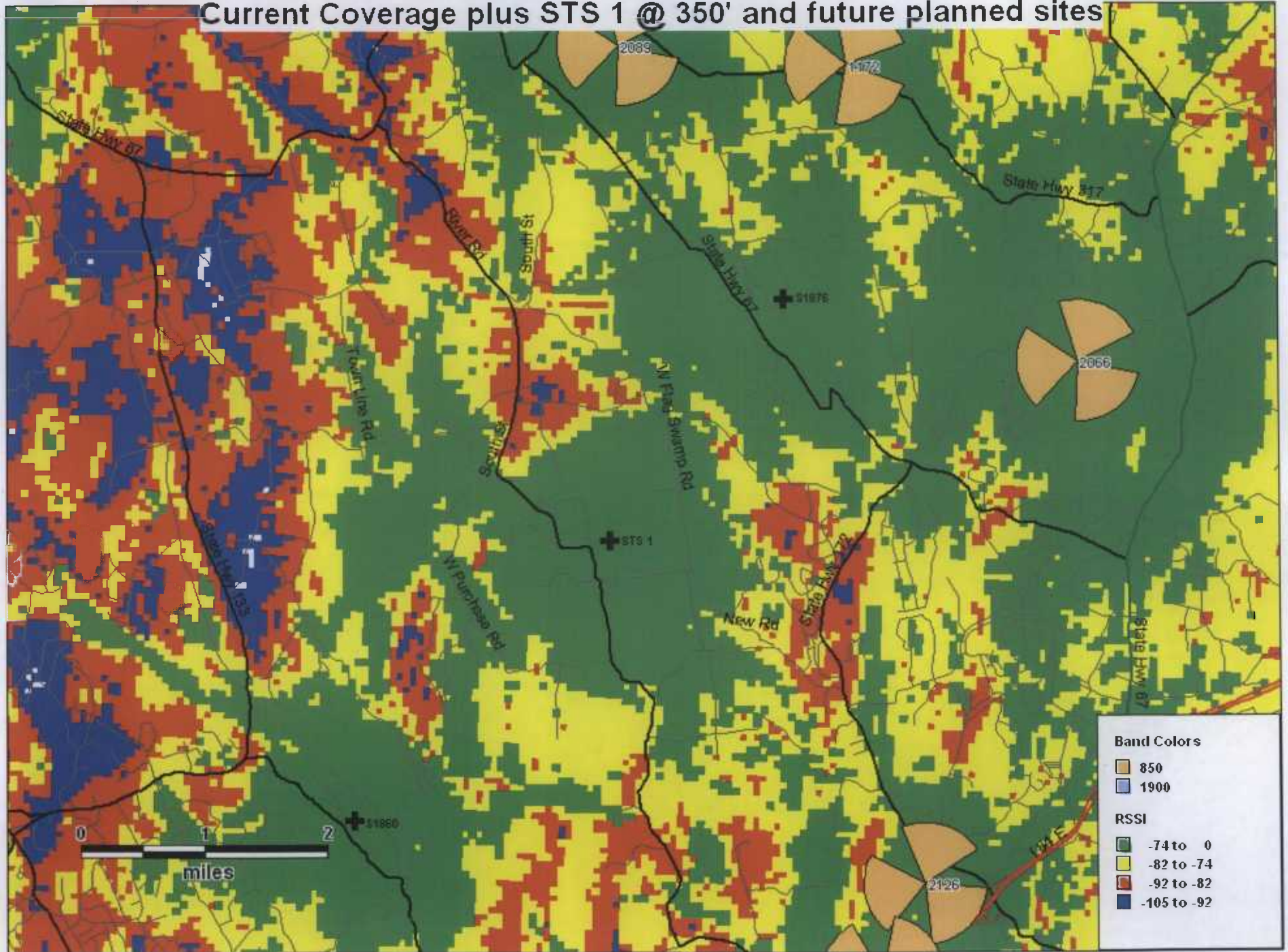
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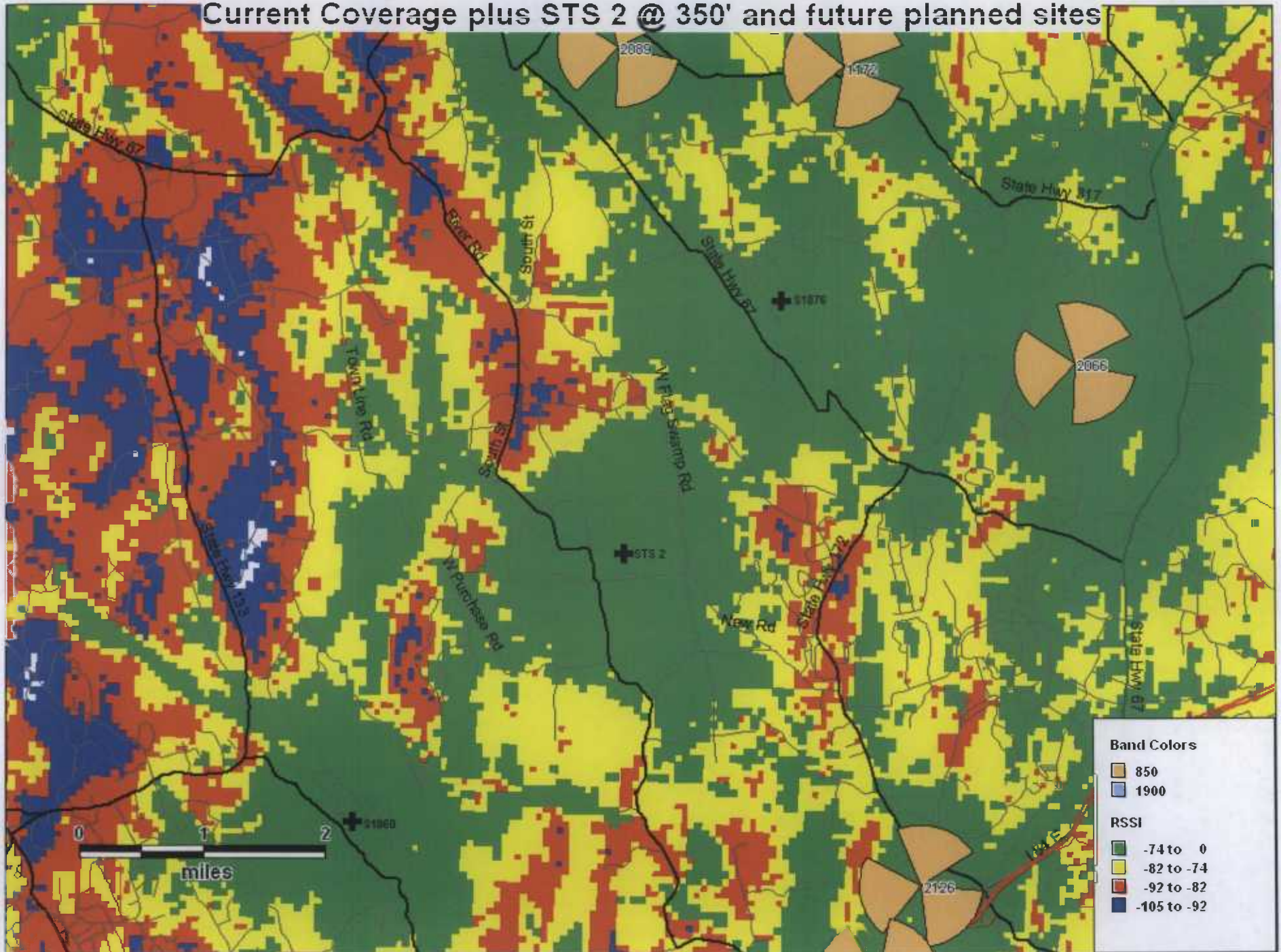
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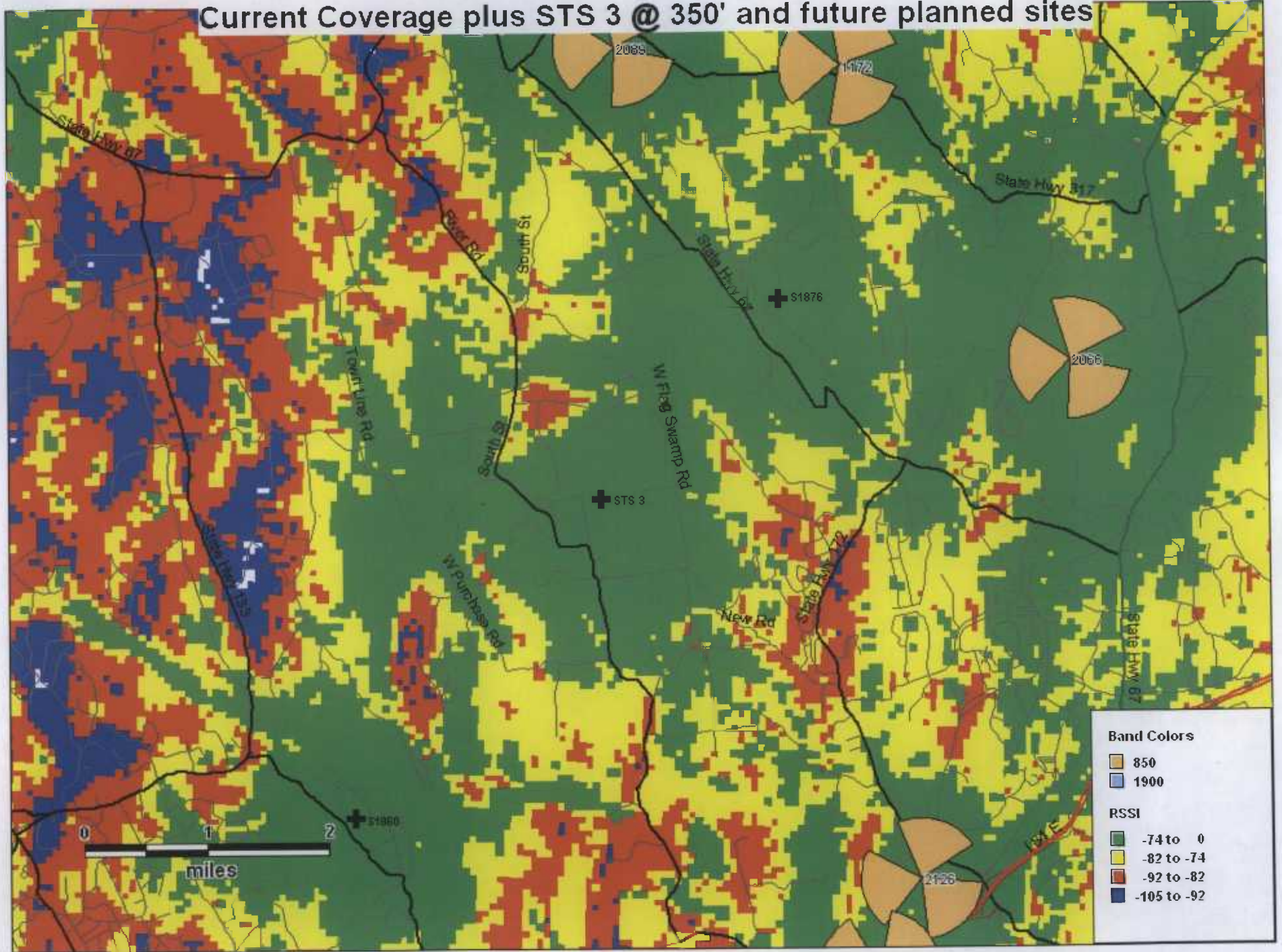
Current Coverage plus STS 1 @ 350' and future planned sites



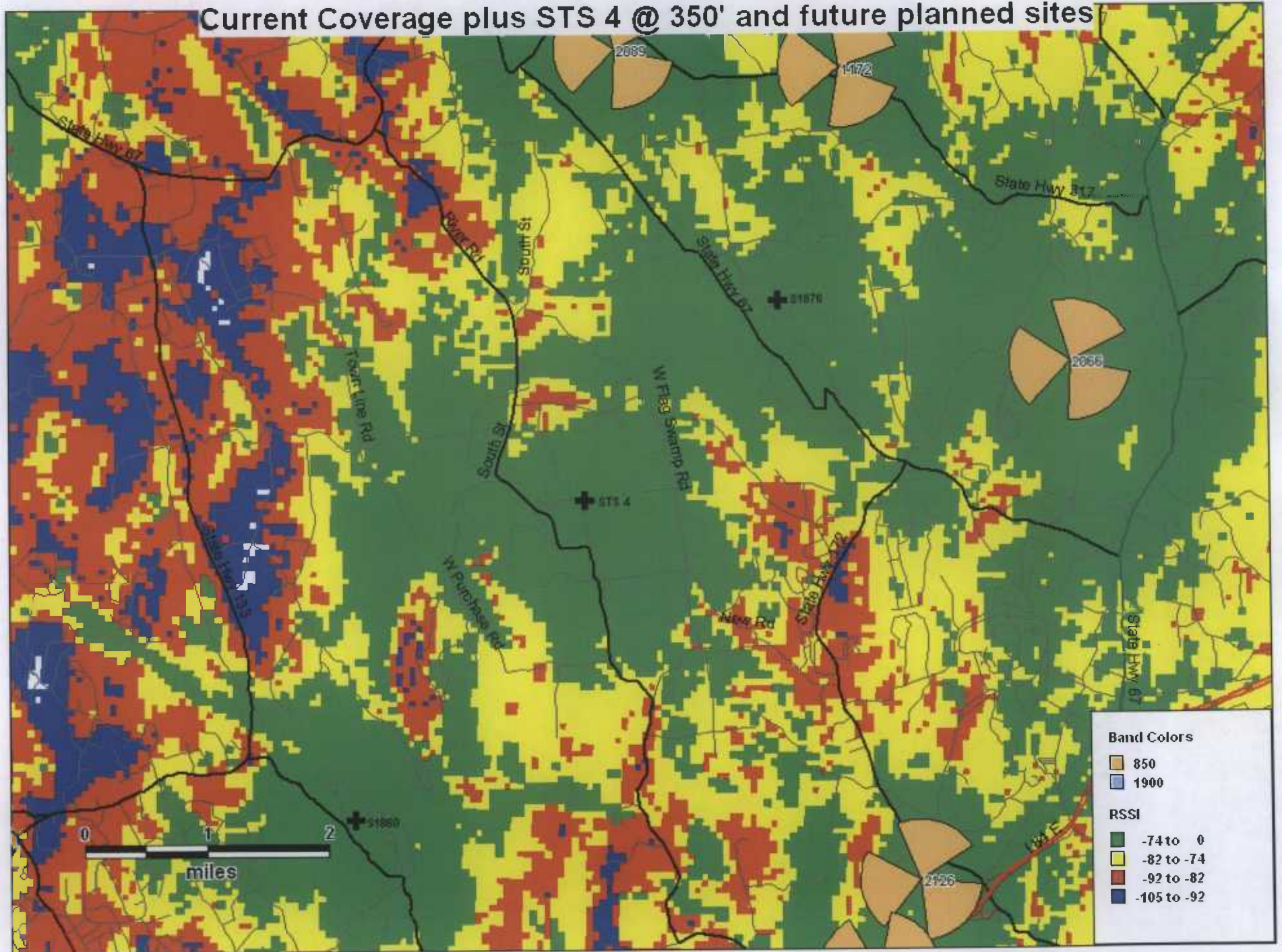
Current Coverage plus STS 2 @ 350' and future planned sites



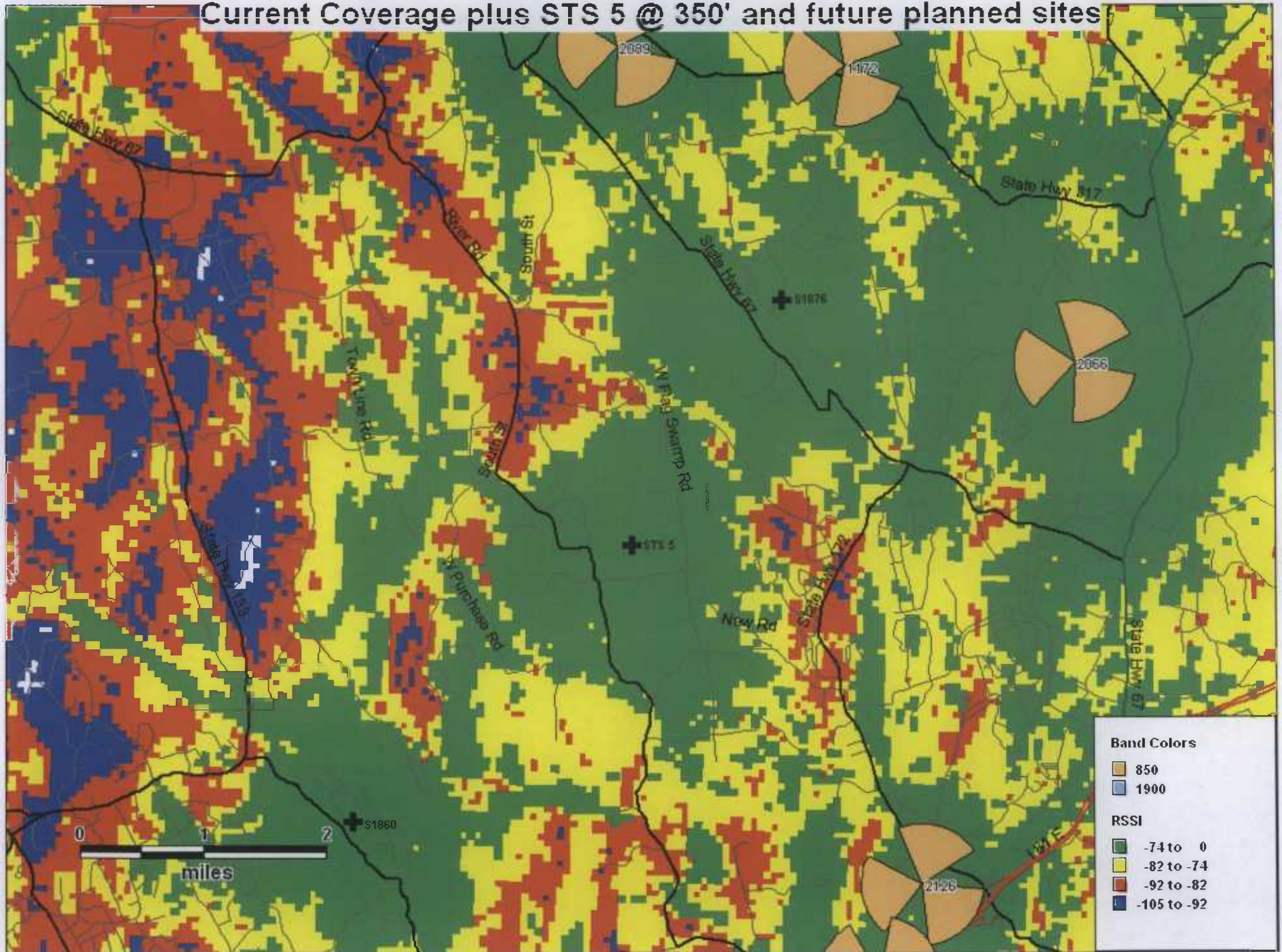
Current Coverage plus STS 3 @ 350' and future planned sites



Current Coverage plus STS 4 @ 350' and future planned sites



Current Coverage plus STS 5 @ 350' and future planned sites



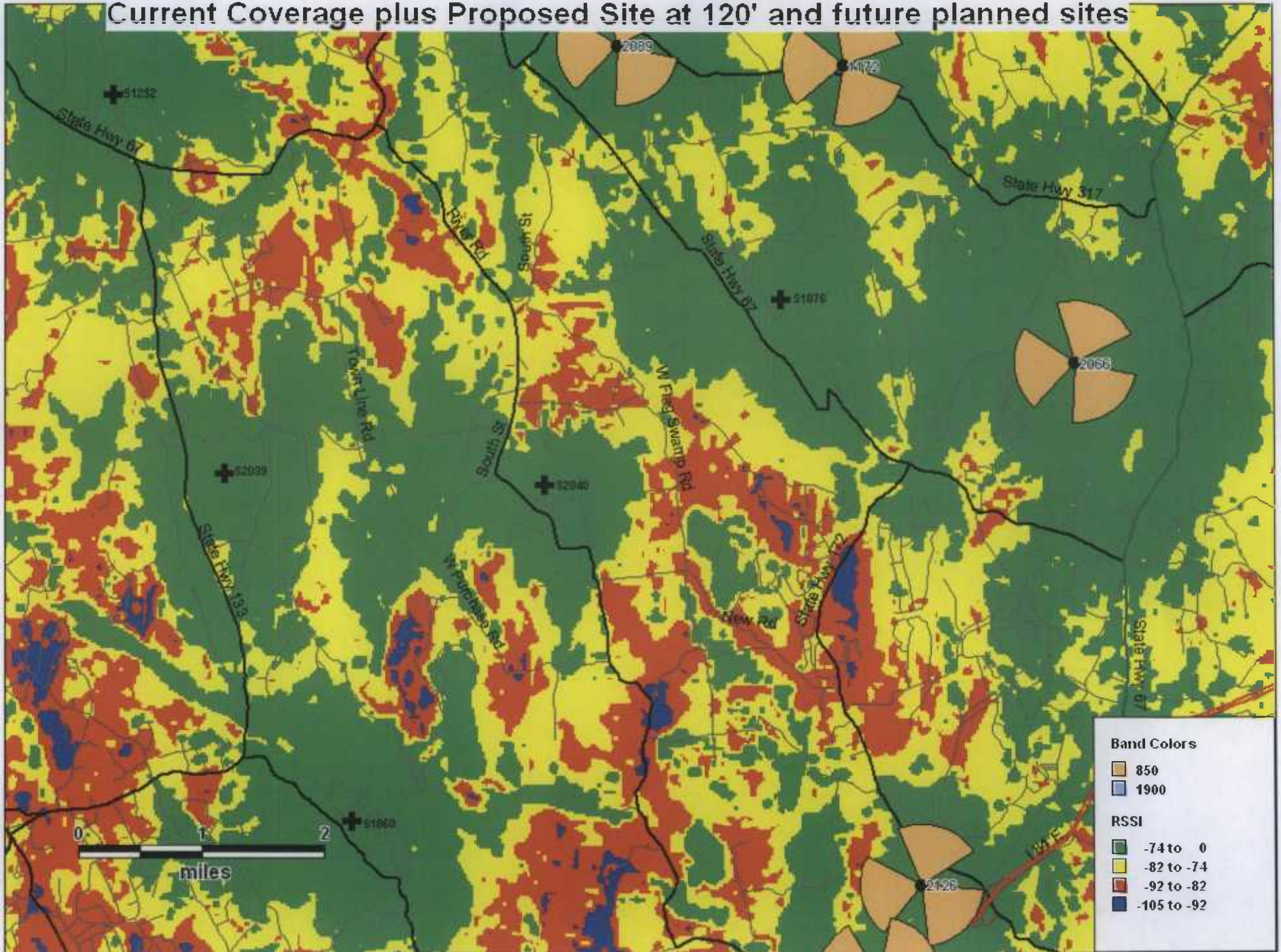
DATE: March 25, 2010
TO: Daniel M. Laub, Esq.
RE: Residence Count - Southbury

The numbers of residences within 1000 feet of the proposed alternate tower sites as depicted on the Southbury Training School Alternate Site Map are as follows:

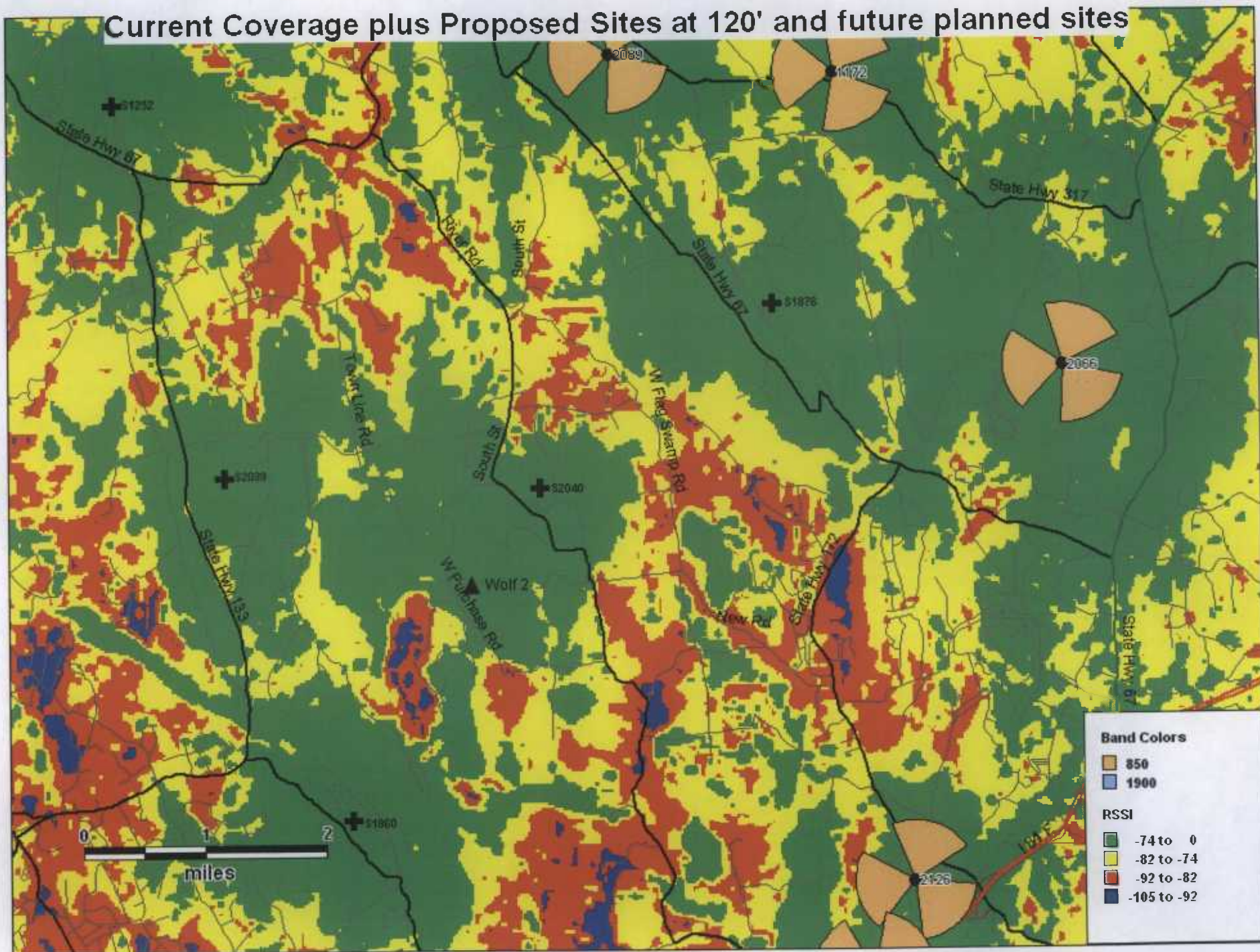
1. Location #1- 5 residences
2. Location #2- 9 residences
3. Location #3- 17 residences

The number of residences was arrived at by using the Southbury GIS website and the topographic maps provided to locate the towers on their respective parcels.

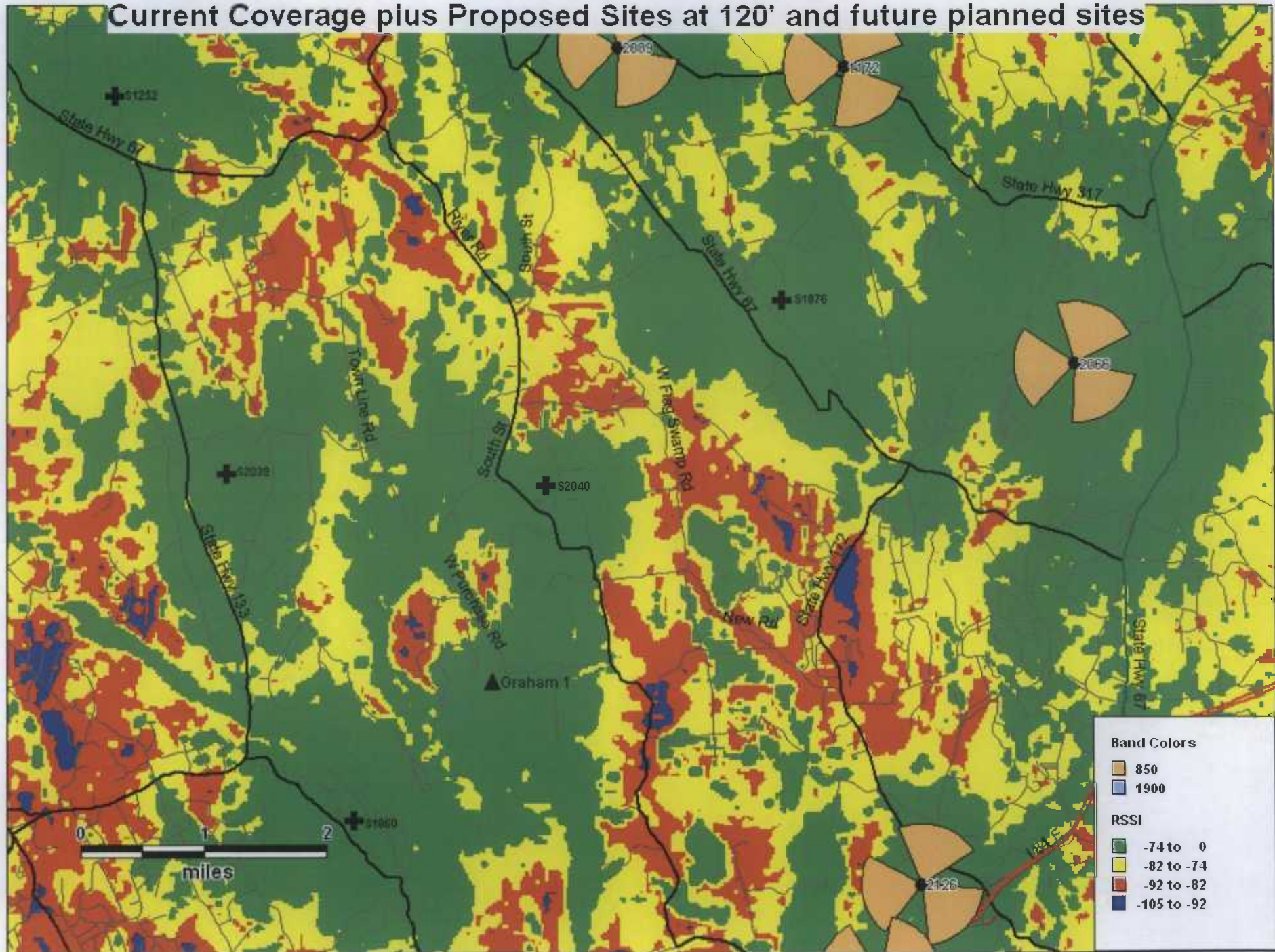
Current Coverage plus Proposed Site at 120' and future planned sites



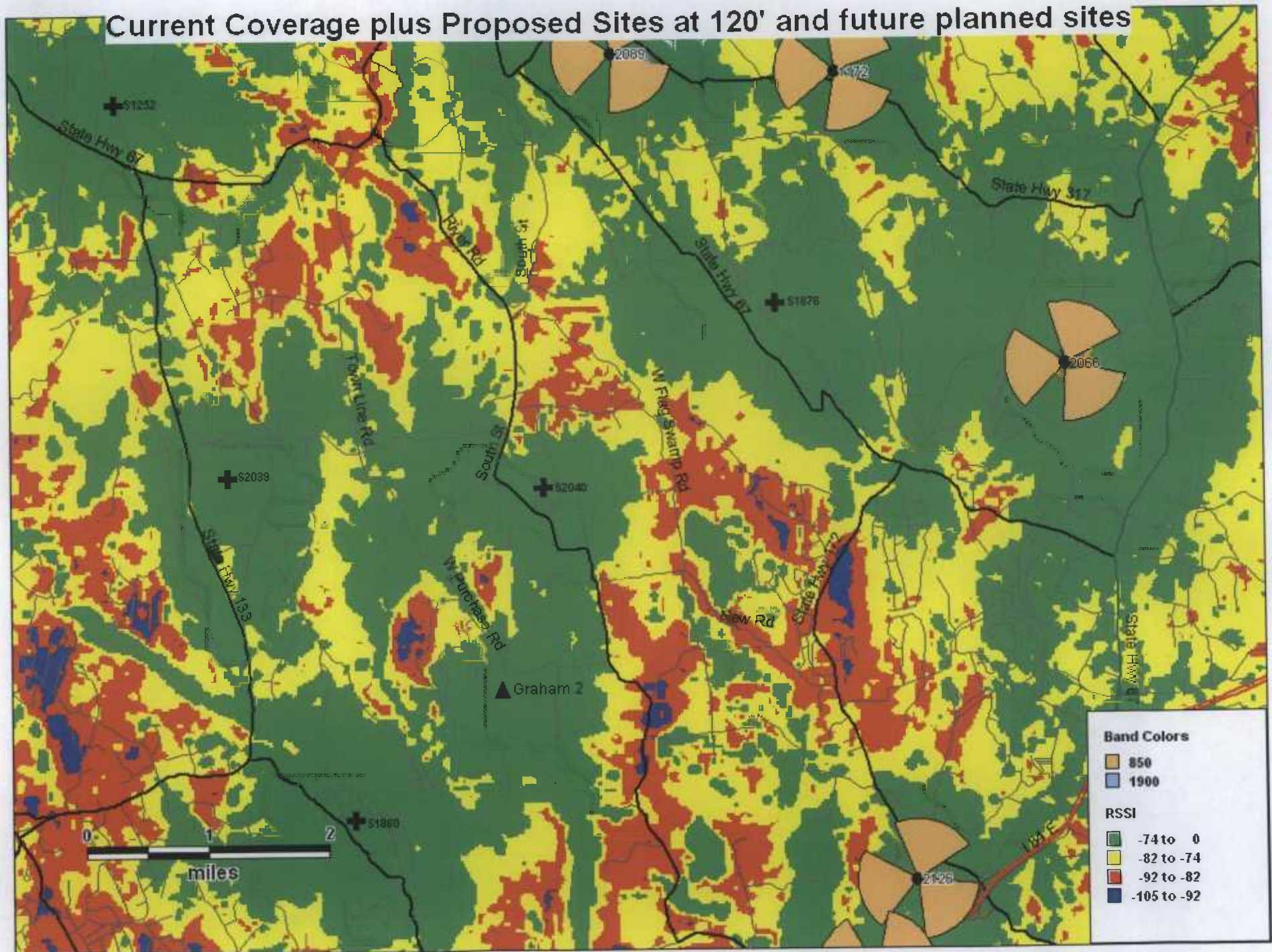
Current Coverage plus Proposed Sites at 120' and future planned sites



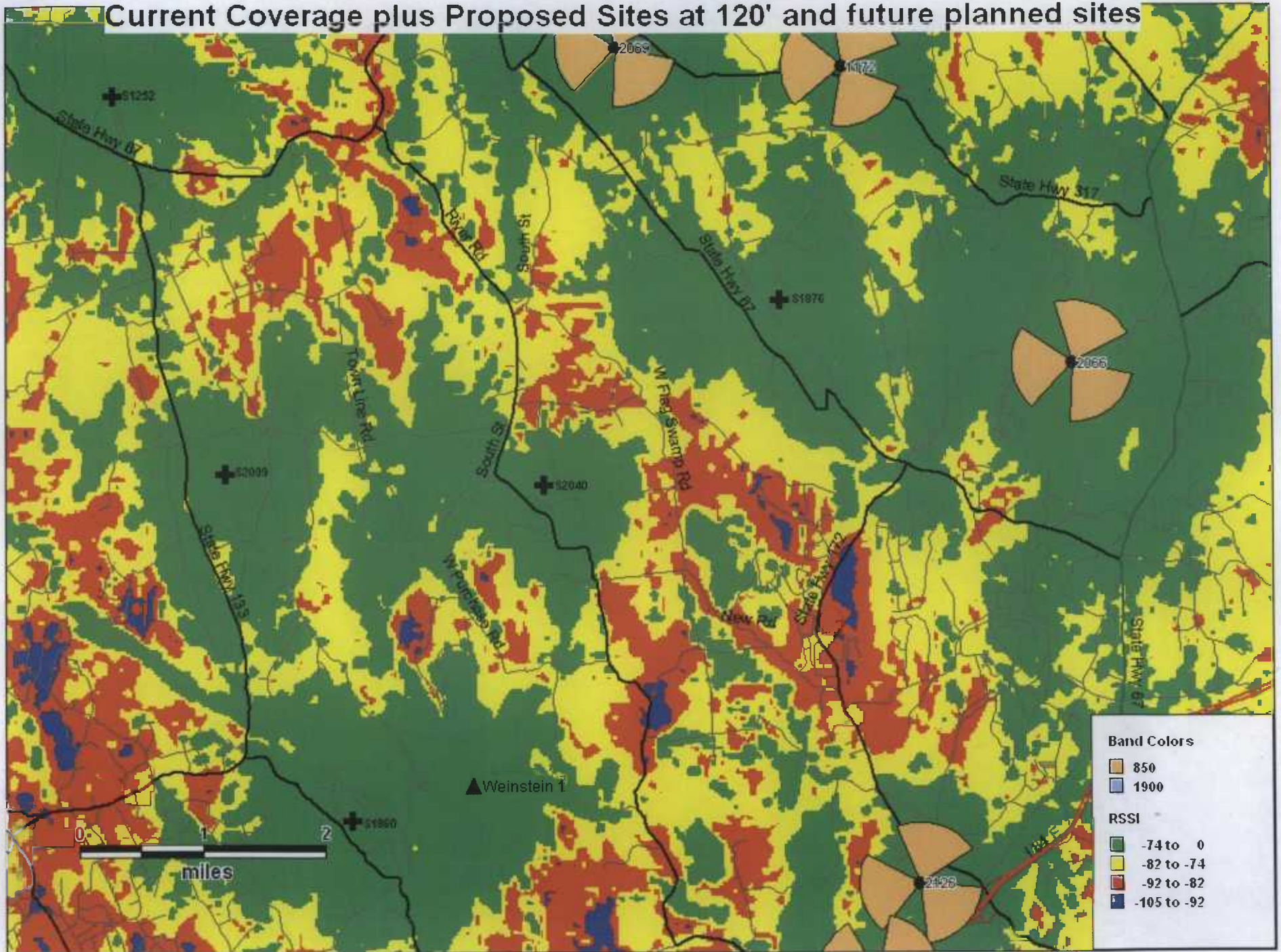
Current Coverage plus Proposed Sites at 120' and future planned sites



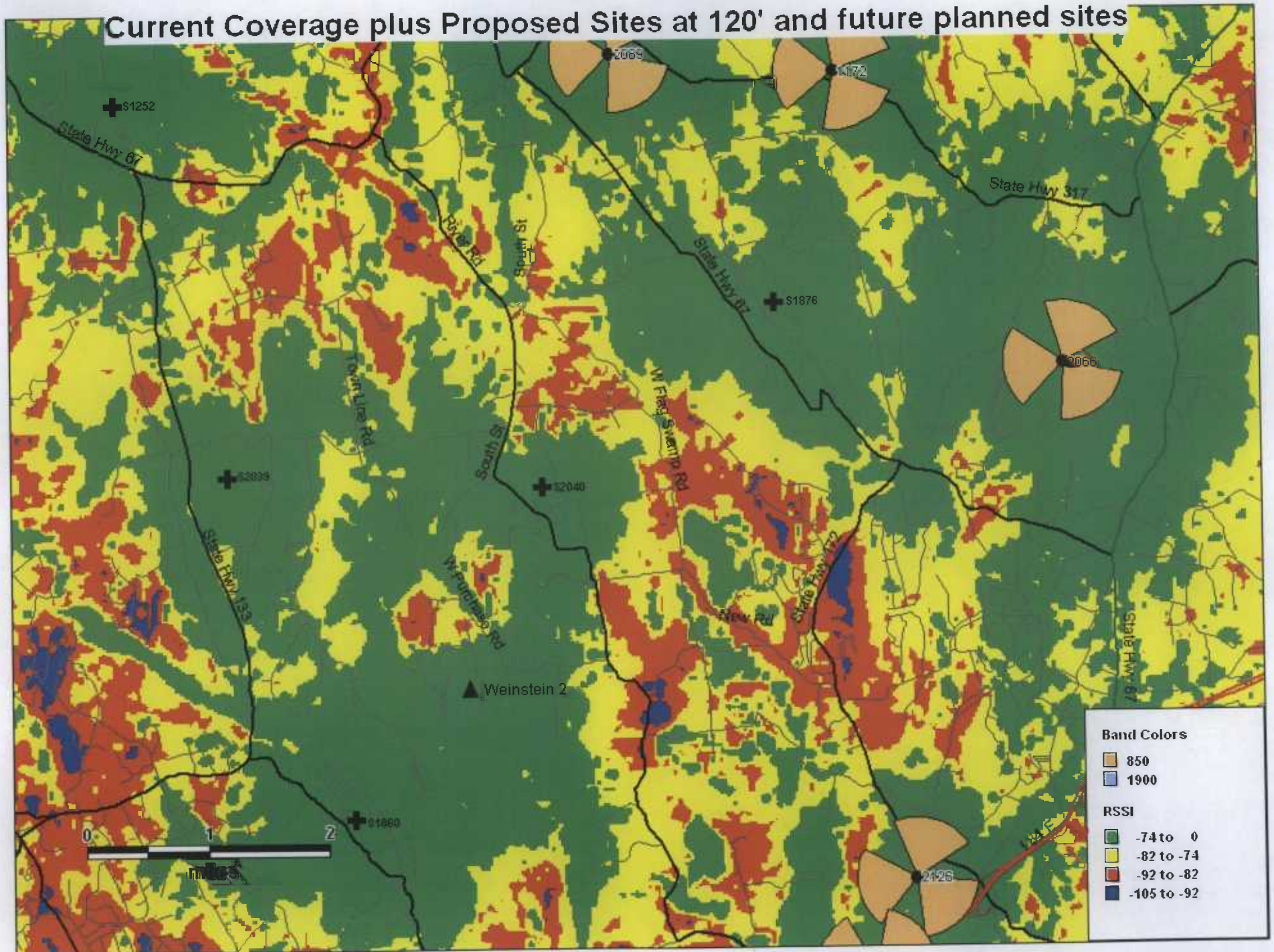
Current Coverage plus Proposed Sites at 120' and future planned sites



Current Coverage plus Proposed Sites at 120' and future planned sites



Current Coverage plus Proposed Sites at 120' and future planned sites



Current Coverage plus Proposed Sites at 120' and future planned sites

