

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY OMNIPPOINT
COMMUNICATIONS, INC. FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 123 PINE ORCHARD ROAD IN THE TOWN
OF BRANFORD, CONNECTICUT

DOCKET NO. _____

Date: September 11, 2009

**APPLICATION FOR CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED**

Pursuant to General Statutes § 16-50g *et seq.* and § 16-50j-1 *et seq.* of the Regulations of Connecticut State Agencies, Omnipoint Communications, Inc., a subsidiary of T-Mobile USA, Inc. d.b.a. T-Mobile ("T-Mobile"), submits this Application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a wireless telecommunications facility (the "Facility") at 123 Pine Orchard Road in the Town of Branford (the "Application").

I. EXECUTIVE SUMMARY

T-Mobile seeks to construct, maintain and operate a telecommunications facility on property known as 123 Pine Orchard Road in Branford (the "Property"). The proposed Facility is part of a series of T-Mobile facilities being proposed in the State to fill coverage gaps along the Amtrak rail line. The Facility will consist of a 125-foot monopole structure with antennas mounted thereon with standoff cross arms and related equipment on the ground nearby. The Facility will sit within a 5,625 square foot area leased by T-Mobile, located in the southeasterly portion of the Property, which is a

4.15 acre parcel. An eight-foot chain link fence will secure and conceal the equipment at the Facility. Vehicle access to the Facility will extend from Pine Orchard Road along an existing paved driveway and parking lot.

Included in this Application and the exhibits attached hereto are survey-based plans for, and a topography map of, the proposed Facility, Exhibits B and C, and other information detailing the proposed Facility. The reports and supporting documentation included in this Application contain the relevant site specific information required by statute and the Connecticut Siting Council's (the "Council") regulations. Included herein as Exhibit D is a copy of the Council's Community Antenna Television and Telecommunication Facilities Application Guide with references to this Application.

II. BACKGROUND INFORMATION

A. The Applicant

T-Mobile is a Delaware corporation with a Connecticut office at 35 Griffin Road South, Bloomfield, Connecticut, 06002. The company and its affiliated entities are licensed by the Federal Communications Commission ("FCC") to construct and operate a personal wireless services system in Connecticut, which has been interpreted as a "cellular system" within the meaning of General Statutes § 16-50i (a) (6). T-Mobile does not conduct any other business in the State of Connecticut other than the provision of cellular services under FCC rules and regulations. T-Mobile is committed to use the proposed Facility as the anchor tenant.

Correspondence and/or communications regarding this Application should be addressed to the attorneys for the Applicant:

Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604
(203) 368-0211
Attention: Julie D. Kohler, Esq.
Monte E. Frank, Esq.
Jesse A. Langer, Esq.

B. Application Fee

The estimated total construction cost for the Facility is \$198,000.00. In accordance with § 16-50v-1a(b) of the Regulations of Connecticut State Agencies, a check made payable to the Council in the amount of \$1,000.00 accompanies this Application.

C. Compliance with General Statute § 16-50/ (c)

T-Mobile is not engaged in generating electric power in the State of Connecticut and, therefore, the proposed Facility is not subject to General Statute § 16-50r. The proposed Facility has not been identified in any annual forecast reports and, therefore, is not subject to General Statute § 16-50/ (c).

III. SERVICE AND NOTICE REQUIRED BY GENERAL STATUTE § 16-50/ (b)

Pursuant to General Statutes § 16-50/ (b), T-Mobile sent copies of this Application to municipal, regional, State, and Federal officials. A certificate of service, along with a list of the parties served with a copy of the Application is attached hereto as Exhibit E. Pursuant to § 16-50/ (b), T-Mobile caused notice of its intent to submit this Application to be published on two occasions in *The New Haven Register*. A copy of

the legal notice and the publisher's certificate of publication are attached hereto as Exhibit F. In compliance with § 16-50/ (b), notices were sent to each person appearing of record as owner of a property which abuts the Facility. Certification of such notice, a sample notice letter, and the list of property owners to whom the notice was mailed are included in Exhibit G.

IV. STATEMENT OF NEED AND BENEFIT

A. Statement of Need

In amending the Communications Act of 1934 with the Telecommunications Act of 1996, the United States Congress recognized the important public need for high quality telecommunications services throughout the United States. The purpose of the Telecommunications Act of 1996 was to "provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans." H.R. Conf. Rep. No. 104-458, 206, 104th Cong., Sess. 1 (1996). The Telecommunications Act of 1996 expressly preserved State and/or local land use authority over wireless facilities, placed several requirements and legal limitations on the exercise of that authority, and preempted State or local regulatory oversight of radio frequency emissions as more fully set forth in 47 U.S.C. § 332(c)(7). In doing so, Congress sought a balance between the public interest in deployment of wireless services and legitimate areas of State and/or local regulatory control over wireless infrastructure.

The Facility is an integral component of T-Mobile's wireless network in Branford. There is a gap in coverage in this area, specifically along the Amtrak Rail Line, and on Pine Orchard Road, Route 146, Damascus Road and Meadow Wood Road, just south of Interstate 95 and Route 1. The Facility, in conjunction with other existing and future facilities in Branford and surrounding towns, is necessary for T-Mobile to provide wireless services to people living in and traveling through this area of the State, including passengers on the Amtrak Rail Line.

The propagation plots attached hereto as Exhibit H depict T-Mobile's need for the Facility. Based upon the location of the Facility and the current lack of coverage in this area, T-Mobile cannot readily predict a point in time at which the Facility might reach maximum capacity.

B. Statement of Benefits

T-Mobile is a leading provider of advanced wireless voice and data services throughout the United States. T-Mobile has provided such services in Connecticut since the mid-1990s and remains actively involved in the deployment of state-of-the-art wireless services. In recent years, the public's demand for traditional cellular telephone services has evolved to include expectations of seamless service, wherever the public travels, and readily available access to the internet as well as the ability to send and receive voice, text, image and video through their wireless devices continuously. The ever increasing availability and enhanced sophistication of wireless services has led the public to use their wireless devices as their primary form of communication for both personal and business needs.

To help provide the benefits of wireless technologies to all Americans, Congress enacted the Wireless Communications and Public Safety Act of 1999 (the "911 Act"). The purpose of this legislation was to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. In enacting the 911 Act, Congress recognized that networks capable of rapid, efficient deployment of emergency services would enable faster delivery of emergency care, resulting in reduced fatalities and severity of injuries. With each year since passage of the 911 Act, additional anecdotal evidence supports the public safety value of improved wireless communications in aiding lost, ill or injured individuals such as motorists, hikers and boaters.

As an outgrowth of the 911 Act, the FCC mandated that wireless carriers provide enhanced 911 services ("E911") as part of their communications networks. These services ultimately allow 911 public safety dispatchers to identify a wireless caller's geographical location within several hundred feet. T-Mobile has deployed and continues to deploy TDOA (Time Difference of Arrival) network technology to comply with the FCC E911 requirements. The Facility will become an integral component of T-Mobile's E911 network in this area of the state, including along the Amtrak Rail Line. As other wireless carriers expand their service in Branford through the Facility, E911 services will experience additional improvement. AT&T, Pocket and Clearwire have expressed interest in this Facility.

C. Technological Alternatives

The FCC licenses granted to T-Mobile authorizes it to provide cellular and Personal Communication Services (“PCS services”) in this area of the State through deployment of a network of wireless transmitting sites. The Facility is a necessary component of T-Mobile’s wireless network. The Facility will also allow other wireless carriers to provide services in this area. AT&T, Pocket and Clearwire have expressed interest in this facility.

Repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies are not a practicable or feasible means to providing service within the sizeable coverage gap in this area. Terrain variations, topography and tree cover in Branford and the surrounding area, as well as other practical factors limit the use of such technologies and preclude their implementation as alternatives to the proposed Facility. There are no equally effective technological alternatives to construction of a new tower facility for providing reliable personal wireless services in this area of Connecticut.

V. SITE SELECTION AND TOWER SHARING

A. Site Selection

T-Mobile selects a site in an area where there is an existing need or problem regarding coverage or capacity within T-Mobile’s network. The site selected is the geographical location where the installation of a telecommunications facility would likely address the identified coverage or capacity issue. T-Mobile conducts a site search with

the goal of finding a site that will resolve the coverage or capacity issue and minimize any potential environmental impact.

T-Mobile conducted a site search in this area of Branford and has identified the Property as the best possible location to resolve the existing coverage concerns. The nearest telecommunication towers are already in use by T-Mobile. There are no other facilities or structures which T-Mobile could utilize to close the existing coverage gap.

The Site Selection narrative and map of rejected sites and facilities within a four mile radius, Exhibits I and J, provides a complete explanation of T-Mobile's methodology for conducting site searches, the actual search for potential sites in Branford, and depicts the locations reviewed during T-Mobile's search and the reasons for elimination from consideration of all but the Property. Due to the nature of development and terrain in the area, the Property is uniquely suited for a telecommunications tower.

B. Tower Sharing

To promote the sharing of wireless facilities in Branford, T-Mobile proposes to construct a facility that can accommodate T-Mobile and three other antenna platforms and related equipment for the wireless carriers in the Connecticut marketplace. AT&T, Pocket and Clearwire have expressed interest in this facility. Municipal public safety antennas also could be accommodated at no cost to the Town. Details of the design are included in Exhibit B. Materials provided by T-Mobile to the Town of Branford articulated T-Mobile's willingness to provide, free of charge, space on the proposed monopole for municipal public safety communications antennas.

VI. FACILITY DESIGN

T-Mobile will lease a 5,625 square foot area within the Property, which is an approximately 4.15 acre parcel. The Facility will consist of a 125-foot monopole structure. T-Mobile will install up to three panel antennas per sector (three sectors) at 122'9" AGL and place its equipment cabinets nearby. The compound will be enclosed by an eight-foot chain link fence. The monopole tower and equipment compound are designed to accommodate the facilities of all wireless carriers active in the Connecticut marketplace. T-Mobile will make space available, free of charge, for municipal public safety communications.

Vehicular access to the Facility would extend from Pine Orchard Road over an existing paved driveway and parking lot. T-Mobile will extend utility service underground from an existing transformer. Exhibit B contains plans, descriptions and other relevant information for the Facility. Exhibit K is an inland wetlands delineation report and statement of compliance. Exhibit L is a listing of residential building within 1000 feet of the Facility. In summary, those exhibits reveal the following:

- The Property is zoned for residential (R-3);
- The nearest wetlands are 150 feet from the Facility; the construction, maintenance and operation of the Facility will not have an adverse impact on this wetland system
- The Property is currently used for commercial storage;
- Minimal grading will be required for the construction of the Facility;
- The Facility will not require the removal or relocation of any trees; and

- The Facility will have no impact on water flow, water quality, or air quality and will comply with relevant noise regulations.

VII. ENVIRONMENTAL COMPATIBILITY

Pursuant to General Statutes § 16-50p, the Council is required to find and to determine as part of the Application process any probable environmental impact of the Facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forest and parks, air and water purity and fish and wildlife. As demonstrated in this Application and the accompanying attachments and documentation, the Facility will not have a significant adverse environmental impact.

A. Visual Assessment

The visual impact of the Facility will vary from different locations around the Facility depending upon factors such as vegetation, topography, distance from the Facility, and the location of structures around the Facility. Exhibit M contains a computer-based, predictive viewshed model, which has proven to depict accurately the potential impact of the Facility from surrounding views as well as a Visual Resource Evaluation.

T-Mobile retained visibility experts Vanasse Hangen Brustlin (“VHB”) to prepare the Visual Resource Evaluation. As part of its study, on July 14, 2009, VHB conducted a balloon float test at 125 feet AGL to evaluate the potential viewshed impacts, if any, associated with the Facility. With this balloon float, VHB sought to determine the visibility impact of the Facility, accounting for local, state and federal historic and

recreational sites within the study area, as well as within a two-mile radius of the proposed Site (the "Study Area").

The topography and vegetation contained at the Property and within the Study Area serve to minimize the potential visual impact of the Facility. The existing vegetation in the area of the Property is mixed deciduous hardwood species with an average estimated height of sixty feet. This vegetation sits on gently rolling hills that range in ground elevation from approximately sea level to approximately 150 feet ASML. The tree canopy covers nearly 2,847 acres of the 8,042 acre Study Area. Nearly 2000 acres of the Study Area consists of open water views south of the Facility on portions of Long Island Sound, Branford Harbor and Branford River.

The Visual Resources Evaluation demonstrates that the Facility will be as inconspicuous as possible. Based on the viewshed analysis contained in Exhibit M, areas from which the Facility will be at least partially visible year round comprise 683 acres. Approximately ninety-three percent of this acreage consists of open water views on Long Island Sound and Branford Harbor. Aside from these open water views, some areas near the Facility may have year round visibility including select portions of Route 146 approximately .60 miles to the southwest of the Facility, Knollwood Drive about .17 miles to the northeast, and a short segment of Pine Orchard Road within the immediate vicinity of the Facility. Overall, the Facility will be partially visible to only sixteen residences within the Study Area, which includes four residences on Pine Orchard Road, three residences on Knollwood Drive, eight residences on Route 146, and one residence on Hotchkiss Grove Road. Areas of seasonal visibility comprise of approximately thirty-three additional acres, which is made up of select portions of Route

146, Knollwood Drive, Collins Drive and Ark Road. There are about twenty-two additional residences that may have limited seasonal views of the Facility including four residences on Route 146, four residences on Knollwood Drive, up to twelve residences on Collins Drive and two residences on Ark Road.

The Facility will have a *de minimis* visual impact as it will be screened by the proposed fencing and existing vegetation. These Visual Resources demonstrate that the Facility will not be obtrusive, even from most of the areas where the Facility will be partially visible. Accordingly, the proposed Facility will not result in an unacceptable adverse visual impact. Weather permitting, T-Mobile will raise a balloon with a diameter of at least three (3) feet at the Facility on the day of the Council's first hearing session on this Application, or at a time otherwise specified by the Council.

B. Solicitation of State Agency Comments

T-Mobile submitted a request for review and comment for the Facility to the Connecticut State Historic Preservation Officer ("SHPO") and obtained the necessary maps from the database of the Connecticut Department of Environmental Protection ("DEP"). SHPO has determined that, given the nature of the terrain and soil on the Property, no impact is anticipated. The DEP map reveals that the Facility will be near a wetlands system. Yet, as explained in Part VIII.D., *supra*, the Facility will not have an adverse impact on that wetland system. A copy of the SHPO correspondence and the DEP map regarding the Facility is attached hereto as Exhibit N.

C. MPE Limits/Power Density Analysis

In August 1996, the FCC adopted a standard for exposure to Radio Frequency ("RF") emissions from telecommunications facilities like the Facility proposed in this

Application. To ensure compliance with applicable standards, T-Mobile performed maximum power density calculations for the Facility assuming that the antennas were pointed at the base of the tower and all channels were operating simultaneously. The resulting power density for T-Mobile's operations would be approximately 6.9750% of the applicable MPE standards. A copy of the power density calculations and report for the Facility is attached hereto as Exhibit O.

D. Other Environmental Factors

The Facility will be unmanned, requiring infrequent monthly maintenance visits by each carrier that will last approximately one hour. T-Mobile's equipment at the Facility will be monitored 24 hours a day, 7 days a week from a remote location. The Facility will not require a water supply or wastewater utilities. No outdoor storage or solid waste receptacles will be needed, and the Facility will not create or emit any smoke, gas, dust or other air contaminants, noise, odors or vibrations. The construction and operation of the proposed Facility will have no significant impact on air, water, or noise quality.

T-Mobile retained EBI Consulting ("EBI") to evaluate the Facility in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969 (the "NEPA"). A copy of the NEPA Report is attached hereto as Exhibit P. The Facility is not designated as a wilderness area and it is not located in any areas identified as a wildlife preserve or in a U.S. Fish and Wildlife Service National Wildlife Refuge. The Facility will not affect threatened or endangered species or designated critical habitats. No National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands are located in the vicinity of the Facility. Further, according to the site survey and field investigations, the Facility will not

impact any federal or state regulated wetlands or watercourses. In addition, the Facility will not be located within a 100-year or 500-year floodplain.

The Facility will not affect any sites, buildings, structures or objects significant to American history, architecture, culture, archeology or engineering. EBI consulted with two Native American tribes, the Mashantucket Pequot Tribe and the Narragansett Indian Tribe, because they might have had interests impacted by the construction, operation and maintenance of the Facility. The Mashantucket Pequot Tribe confirmed that it does not have any interests that would be impacted by the Facility. The Narragansett Indian Tribe did not respond to EBI's several communications and, therefore, EBI concluded that the Narragansett Indian Tribe has no interest in the Facility. As such, the Facility is categorically excluded from any requirement for further environmental review by the FCC in accordance with the NEPA and no permit is required by the FCC prior to construction of the proposed Facility. See 47 C.F.R. §§ 1.1306(b) and 1.1307(a).

Finally, VHB analyzed whether the Facility meets the requirements of the Connecticut Coastal Management Act, General Statutes § 22a-90 *et seq.* (the "CMA"). A copy of VHB's report is attached as Exhibit N. Although located within the "coastal area" (the entire Town of Branford is located within the "coastal area"), the Property is located outside the "coastal boundary," and there are no "coastal resources" located on the Property. The nearest "coastal resource" is the Branford River, which is approximately 1,800 feet to the southwest of the Property and across the tracks of the Amtrak rail line. Accordingly, the Facility will not impact any "coastal resources" and will comply with the requirements of the CMA.

VIII. CONSISTENCY WITH THE BRANFORD LAND USE REGULATIONS

The Facility will be consistent with Branford's Zoning and Wetland Regulations and Plan of Conservation and Development. A description of the zoning classification of the Facility and the planned and existing uses of the Property are also detailed in this section.

A. Branford Plan of Development

The Branford Plan of Conservation and Development (the "Plan"), a copy of which is included in the bulk filing, was adopted on November 20, 2008. The Plan addresses the need to provide utilities, such as wireless telecommunication services, that are "appropriately located" and of "adequate capacity." See Bulk Filing, Plan of Conservation and Development, p. 85. The Plan also concedes that wireless services are poor in some areas of the Town. *Id.*, p. 86. Accordingly, the construction, maintenance and operation of telecommunications facilities such as the Facility will provide the Town's residents with much needed wireless communications services. The Facility will also improve the Town's ability to provide its residents with emergency services.

B. Branford Zoning Regulations

Section 36.12 of the Branford Zoning Regulations addresses telecommunications facilities and sites. See Bulk Filing, Old Lyme Zoning Regs. c. 3, § 36.12. The Facility comports with a majority of the requirements and standards articulated by the Regulations, as follows.

- The Facility will minimize any adverse visual effects. As discussed in Part VII.A., *supra*, the Facility will have a *de minimus* visual impact. The existing

topography and mature vegetation will limit, for the most part, the visual impact to partial views in the immediate surrounding vicinity;

- The Facility will encourage shared use and the limited number of towers. It will be engineered to accommodate three additional carriers. The Facility will also provide for co-location of municipal antennae at no charge to the Town;
- Although the Facility will be located in a residential zone – in an area with a coverage gap — it will be located in an area where the existing topography and mature vegetation will provide excellent screening;
- The Facility will not have any lighting attached to it — other than as required by the FAA. Sitesafe has determined at this stage that the Facility will not require any lighting;
- The Facility will not have any commercial advertising or signage;
- The Facility is proposed at 125', which complies with § 25.3 of the Regulations; and
- Although the Facility does not meet all of the setback requirements for R-3 zoned property, it is setback approximately 485' from Pine Orchard Road, with excellent screening from mature trees.

C. Planned and Existing Land Uses

The Property is currently used as a storage facility and garage for truck trailers.

T-Mobile is not aware of any future development plans regarding the Property.

D. Branford Inland Wetlands and Watercourses Regulations

The Branford Inland Wetlands and Watercourses Regulations (“Local Wetlands Regulations”) regulate certain activities conducted in or adjacent to “wetlands” as

defined therein. One such regulated activity is any "removal or deposition of material, or any obstruction, construction, alteration or pollution" of such a wetland and in areas adjacent to a wetland or watercourse. See Bulk Filing, Inland Wetlands and Watercourses Regulations, § 2.1. The Local Wetlands Regulations define a specific buffer area as 100 feet measured horizontally from the boundary of a wetland or watercourse. See *id.*

According to the site survey and field investigations conducted at the Property, there are no watercourses or wetlands located within 100 feet of the Facility. The nearest wetlands are approximately 150 feet from the Facility on an adjoining parcel. Regardless, T-Mobile hired VHB to ascertain whether the proposed Facility would have a detrimental impact on those wetlands. VHB concluded that the Facility would have no such impact. In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council of Soil and Water Conservation, soil erosion control measures and other best management practices will be established and maintained throughout the construction of the Facility.

IX. CONSULTATIONS WITH LOCAL, STATE AND FEDERAL OFFICIALS

A. Local Consultations

General Statutes § 16-50f (e) requires an applicant to consult with the local municipality in which a proposed facility may be located and with any adjoining municipality having a boundary of 2,500 feet from the proposed facility concerning the proposed and alternate sites of the facility. On May 28, 2009, T-Mobile submitted a technical report to the First Selectman regarding the Facility. The technical report, a

copy of which is being bulk filed with this Application, included specifics about the Property, the Facility, the site selection process and the environmental effects of the proposed Facility. Other materials provided to the Town during the consultation period are attached as Exhibit Q. On June 16, 2009, representatives of T-Mobile met with the Honorable Anthony DaRos, the First Selectman, to discuss the Facility and answer any questions the Town might have regarding the Facility. The Town did not require a public meeting regarding the Facility.

B. Consultations with State Officials

As noted in Section VII.B of this Application, T-Mobile undertook a consultation with the SHPO and obtained a DEP map from the DEP's database in the course of its NEPA survey. Copies of the correspondence with SHPO and the DEP map are attached hereto as Exhibit N.

C. Consultation with Federal Agencies

T-Mobile received a report from SiteSafe concerning compliance with the Federal Aviation Administration ("FAA") for the Facility, which is attached hereto as Exhibit R. The results indicate that the Facility would not require FAA registration, let alone FAA review as a potential air navigation obstruction or hazard. Therefore, no FAA lighting or marking would be required for the towers proposed in this Application. T-Mobile will forward copies of the final FAA approval when received.

T-Mobile's FCC license permits it to modify its network by building wireless facilities within its licensed area without prior approval from the FCC provided that a proposed facility does not fall within one of the "listed" categories requiring review under NEPA. The "listed" categories, included in 47 C.F.R § 1.1307, are activities that may

affect wilderness areas, wilderness preserves, endangered or threatened species, critical habitats, National Register historic districts, sites, buildings, structures or objects, Indian religious sites, flood plains and federal wetlands. The resulting report, attached hereto as Exhibit P, confirm that the Property does not fall under any of the NEPA “listed” categories of 47 C.F.R. §1.1307. Therefore, the proposed Facility does not require review by the FCC pursuant to NEPA.

X. ESTIMATED COST AND SCHEDULE

A. Overall Estimated Cost

The total estimated cost of construction for the Facility is \$198,000.00. This estimate includes:

- (1) Tower and foundation costs (including installation) of approximately \$76,000.00;
- (2) Site development costs of approximately \$79,000.00; and
- (3) Utility installation costs of approximately \$43,000.00.

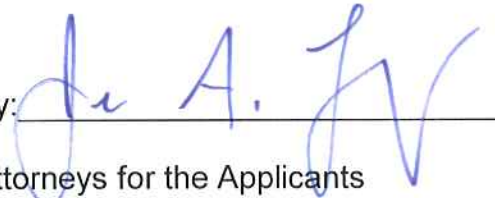
B. Overall Scheduling

Site preparation and engineering would commence immediately following Council approval of T-Mobile’s Development and Management (“D&M”) Plan and is expected to be completed within four (4) to five (5) weeks. Installation of the monopole structure, antennas and associated equipment is expected to take an additional eight (8) weeks. The duration of the total construction schedule is approximately thirteen (13) weeks. Facility integration and system testing is expected to require an additional two (2) weeks after the construction is completed.

XI. CONCLUSION

This Application and the accompanying materials and documentation demonstrate that a public need exists in the Town of Branford for improved wireless services, especially along the Amtrak Rail Line, and that the Facility will not have any substantial adverse environmental effects. T-Mobile therefore respectfully submits that the public need for the Facility outweighs any potential environmental effects resulting from the construction of the Facility, and that the Council should grant a Certificate of Environmental Compatibility and Public Need for the Facility.

Respectfully Submitted,

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