

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 TWO
TELECOMMUNICATIONS TOWER
FACILITY LOCATED AT 1990
LITCHFIELD TURNPIKE IN THE TOWN OF
WOODBIDGE, CONNECTICUT

DOCKET NO. 388

March 12, 2010

AT&T SUPPLEMENTAL RESPONSES TO
SITING COUNCIL PUBLIC HEARING QUESTIONS

Q1. Is CL&P transmission line infrastructure in this area of Woodbridge an available and viable alternative for AT&T's proposed wireless facility?

A1. No. As noted in the application itself on page 7, prior CL&P correspondence behind Tab 2 and the AT&T testimony of Mr. Tim Burks at the public hearing, CL&P infrastructure in close proximity to the AT&T tower proposal was investigated by AT&T at the time of the site search nearly two years ago and is still not a viable alternative.

At the public hearing, the Siting Council asked AT&T to follow up with CL&P directly in an effort to obtain additional information regarding the status of the two 115kV and one 345kV circuits in the area that make up a part of the Middletown to Norwalk line and specifically the limitations on antenna attachments and/or a transmission tower replacement with a taller structure. Additionally, the Siting Council asked that AT&T follow up with CL&P on its policies regarding freestanding communications towers in or near transmission right-of-ways ("ROW").

On January 29, 2010, counsel for AT&T corresponded with representatives of CL&P in furtherance of the Siting Council's request and noted that any joint use of CL&P infrastructure would require a 170' replacement structure near where the transmission lines crosses Dillon Road for AT&T to provide service in the area. Annexed in Exhibit A is AT&T's correspondence along with a response from Mr. John R. Morissette, Manager of CL&P's Transmission Siting and Permitting dated February 19, 2010 which fully responds to all of the information sought by the Siting Council through AT&T and as more specifically addressed below.

a. Federal Energy Reliability Requirements &
Wireless Joint Use of CL&P's Woodbridge Transmission Structures

CL&P has confirmed that, alone or in combination, the transmission reliability ratings of its lines in Woodbridge make obtaining an outage for wireless facility construction associated with one of its structures extremely difficult and/or not recommended at all. These reliability ratings trace their roots to Congress and 2005 amendments to the

Federal Power Act ("FPA") which were adopted in part as a response to the major northeast blackout in 2003. In its FPA amendments, Congress gave greater oversight to the Federal Energy Regulatory Commission ("FERC") and state utility agencies in ensuring the reliability of the nation's electric grid. As such, a planned outage must be coordinated with the North American Electric Reliability Corporation ("NERC"), ISO-New England and Convex among other entities and meet federal reliability requirements. These significant power planning and reliability requirements on many lines affect the ability to obtain a planned outage at all as noted by CL&P and even in its prior responses to interrogatories in CSC Docket F-08 which are also annexed in Exhibit A. Thus, a tower replacement project on either of the three CL&P circuit lines in this area of Woodbridge, and which would be required to meet AT&T's radiofrequency engineering requirements in this case, is highly unlikely due to the federal energy reliability and outage requirements that impact CL&P's ability to make its infrastructure available to AT&T and other wireless carriers.

Even if an outage could be obtained, the timing associated with same is generally calculated in years for circuits like those in Woodbridge and as such AT&T could not accept these terms and conditions which would limit both the timing of initial construction and long term maintenance of its own wireless network infrastructure. Like electric utilities, cellular telephone facilities have been deemed critical infrastructure in the United States as noted in Presidential Proclamation No. 8460. Indeed, while wireless carriers have not had the same level of reliability standards imposed on them by the Federal Communications Commission ("FCC"), significant federal reporting requirements on wireless outages are also now required. See 47 C.F.R. § 4 (FCC's Network Outage Reporting System). AT&T simply can not build a reliable wireless network in accordance with Congressional and FCC expectations and requirements where the timing for initial site construction and subsequent site modifications are completely dependent on third parties and governmental approvals that relate to the national bulk power system and electric grid outages.

In its correspondence, CL&P also identified several other issues associated with high tension power line tower replacement projects that might be initiated by wireless carriers in the State of Connecticut. Principally that such projects are not allowed for steel or lattice CL&P structures that typically support 345kV lines. Such a replacement project could only be coordinated as part of a CL&P initiated steel structure replacement and work contemplated by CL&P on its own lines. Of note, AT&T has done this once previously in 2005 (See CSC Petition No. 744), but is experiencing significant operational impacts that are limiting AT&T infrastructure upgrades for improved service to consumers. This solely due to the construction limitations on such sites associated with electric line outages and the reliability requirements generated at a federal level. As such, these existing AT&T wireless sites on CL&P lines may in fact require long-term relocation as part of AT&T's network.

Taken as a whole from CL&P's letter, it is clear to AT&T and the rest of the wireless industry that transmission structure replacement projects are essentially limited to existing wood transmission line structures in a ROW that supports a single circuit and which has the lowest reliability rating of "1". Interestingly though, CL&P noted that the costs and impact to electric consumers in the State of Connecticut that are associated with outages for such replacement projects and even third party wireless attachments are high and also significantly impacts the viability of any such installations. Further, limitations on easements may also preclude such projects. As such, wireless attachments and even pole replacement projects on this type of CL&P infrastructure could be discouraged based on other State of Connecticut policies which seek to provide ratepayers with lower

costs for electric service and also limitations on the legal rights of CL&P associated with its ROW easements.

In any event, all of this information corroborates AT&T's prior testimony at the public hearing that use of CL&P infrastructure in this area of Woodbridge is not a viable alternative because of federal energy reliability requirements that impact availability, timing, costs and other terms and conditions that would impact both CL&P and AT&T's independent utility networks and associated reliability. We also note that Sections 16-50p(b)(1) and 16-50aa of the Connecticut General Statutes do not require proof that joint use of electric utility infrastructure is not viable as an approval criteria for a new telecommunications tower. Nevertheless, AT&T does recognize that such existing electric utility structures can in some limited cases be used in lieu of a new tower structure which is why they are still investigated despite the costs and reliability issues. In this case, however, there are overriding federal requirements that make joint use of CL&P's lines in the Woodbridge area not feasible for either CL&P or AT&T. Thus, AT&T respectfully submits that such CL&P infrastructure in Woodbridge is not a viable alternative for its own provision of wireless services in this area of the State and requests that the Council adopt such a finding of fact and incorporate same into its opinion on this Docket.

b. CL&P's Other Policies and Preferences
Related to Telecommunications Towers

In its correspondence, CL&P went on to note that freestanding telecommunications towers can not generally be constructed within its ROW's for several fact based reasons and also noted several legal considerations associated with telecommunications uses within its easements. In this case, it's clear that a freestanding telecommunications tower can not be built within CL&P's ROW through this area of Woodbridge. Additionally, CL&P stated a preference that new towers be set back from conductors in its ROW a distance equal to the height of the tower or that yield point be incorporated where that is not practicable and feasible. This information is consistent with AT&T's prior understanding of CL&P policies and preferences and has been incorporated into the tower proposed by AT&T in this Application.

c. AT&T's Siting Policies and Objectives in this Docket

CL&P's letter corroborates AT&T's prior testimony that use of CL&P infrastructure in this area of Woodbridge is not a viable alternative because of the impacts to both CL&P and AT&T associated with federal regulatory standards. As such, having identified during the site search process that CL&P infrastructure was not a viable alternative and finding no other suitable structures, AT&T sought out larger remote parcels near CL&P's transmission line on which a new tower site could be built. This to meet AT&T's requirements for wireless network reliability and do so with a new structure in the same viewshed as the CL&P structures that can be shared by other wireless carriers. That effort resulted in the pending Application which AT&T submits is the best site for a new tower structure that provides network coverage for AT&T and other carriers like Verizon and does so in a manner with the least amount of environmental impacts given its location on the same ridge as the CL&P transmission line infrastructure.

- Q2. Is the UI transmission line infrastructure that extends from Route 69/Litchfield Turnpike to the east an available and viable alternative for AT&T's proposed wireless facility?
- A2. No. UI's ROW contains a 115kV circuit on approximately 50' wood poles that make up its Mix-Glen lake line. AT&T's in-house and outside consulting radiofrequency

engineers evaluated the line as both an antenna attachment or a taller replacement tower. Two specific locations were studied: (1) a pole adjacent to Litchfield Turnpike in the valley and (2) a pole on top of the ridgeline at West Rocks State Park. In all cases, use of UI infrastructure could not provide comparable or adequate coverage due to intervening terrain (i.e. the ridge on which the proposed tower and CL&P lines are located) and would leave gaps in coverage along Routes 63 and 67 to the west. Attached as Exhibit B is a copy of C Squared's report and the Town tax map showing UI's ROW.

Independent of the radiofrequency engineering deficiencies outlined above, it is noted that UI's ROW traverses Class I and II watershed and state forest lands associated with West Rock State Park. As a matter of state law, telecommunications tower facilities are prohibited on such lands. C.G.S. § ; 25-32; C.G.S. §23-25; CSC Administrative Notice 16. While an antenna attachment and ancillary equipment at grade may arguably fall within the ambit of UI's ROW, a replacement tower at significantly greater height could run afoul of these statutory prohibitions. Indeed, it could be argued that a taller replacement tower would also constitute an overburdening of UI's easement for the reasons stated in the Connecticut Supreme Court decision in Zhang v. Omnipoint Communications Enterprises, Inc. 272 Conn. 627 (2005). As such, even if the UI transmission line infrastructure were acceptable for radiofrequency engineering reasons, these legal issues are significant hurdles if not outright prohibitions and as such AT&T would not pursue a tower replacement project on UI's Mix-Glen lake line given the land uses underlying this specific ROW.

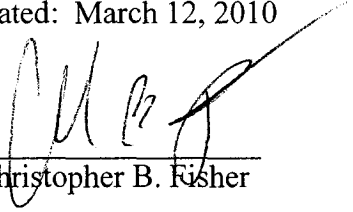
- Q3. Are any of the watershed lands in the vicinity of the project Class III lands where a tower might be allowed by the relevant water company?
- A3. No. On January 26, 2010, counsel for AT&T corresponded by electronic mail with the South Central Connecticut Regional Water Authority ("SCCRWA") asking whether any of its considerable land holdings in the West River System and Lake Dawson Reservoir area were Class III lands. In a response dated January 27, 2010, Dianne Tompkins of SCCRWA noted that all of its land holdings were Class I or II and none were Class III. As such, she verified AT&T's prior testimony that none of the watershed lands in the area were legally available tower sites as a matter of state law. Ms. Tompkins did note that SCCRWA's filtration plant, pump station and two homes would not be prohibited from wireless attachment use under state law as administered by the Department of Public Health. In response, counsel for AT&T noted that the company does use water company infrastructure (namely water tanks) in many cases throughout the state but that in this instance all of the water company infrastructure noted was relatively low and on the valley floor along Route 69/Litchfield Turnpike such that it would not work as a radiofrequency engineering matter in this particular instance. A copy of the SCCRWA electronic mail exchange is included in Exhibit C with SCCRWA's permission along with an aerial photograph of some these features.
- Q4. How tall is the silo on the Shepherd parcel that is immediately adjacent to Route 69/Litchfield Turnpike?
- A4. The existing silo is 40' in height and in an advanced state of disrepair with no cap on it. Like the UI poles and SCCRWA filtration plant along the valley floor, the structure is simply not tall enough nor located at a sufficient ground elevation required to be used as an antenna support structure and meet the AT&T engineering objectives which include Route 63 and Route 67 over the terrain immediately to the west.
- Q5. Provide a viewshed map for a 160' tower and compare it with the viewshed map for the 170' tower as proposed.

- A5. Attached as Exhibit D is a viewshed map for a 160' tower height as prepared by CHA. In comparing the two maps, it is apparent that a 10' tower height reduction would have very little overall change in visibility. The relevant change is best depicted in re-reviewing photographs 3 and 5 of the original visual report behind Tab 4 of the Application. Those photos were taken from points well north and south of the tower site (over 4000' away) along Route 69/Litchfield Turnpike and show marginal tower year round tower visibility above the tree line in the area of where the photos were taken. A 10' tower height reduction would result in slightly less visibility at these two specific view points. Overall, there is no significant change in visibility associated with a 10' reduction in the height of the proposed 170' tower.
- Q6. Provide additional information on abutting properties and the trail that abuts the Shepherd property.
- A6. Attached in Exhibit E is a map entitled Woodbridge Greenway Trails System for the Bishop West Trails that was sourced from the Town of Woodbridge Plan of Conservation and Development. AT&T has added a red dot to denote the proposed location of the tower facility. The map identifies the CL&P transmission lines, numerous open space and watershed parcels and the location of this local trail system in this area of Woodbridge. Starting at Dillon Road, the trail crosses under the CL&P transmission lines and then traverses adjacent properties south. Of note, this trail is not part of the Blue Blaze trail system as set forth in the Connecticut Walk Book. Additionally, this map is consistent with AT&T's testimony at the public hearing that the vast majority of properties in the area are open space and restricted watershed lands and are not legally available for tower siting.
- Q7. Respond to limited appearance statements related to kilns in the area and the location of any such kilns listed on the National Register of Historic Places.
- A7. AT&T has confirmed again with the State Historic Preservation Officer that the location of the kiln listed on the National Register of Historic Places is near the SCCRWA lands on the east side of Route 69/Litchfield Turnpike. There is another kiln on the west side of Route 69/Litchfield Turnpike which was the subject of various public comments. Nevertheless, as noted in the March 3, 2010 correspondence from AT&T's historic consultants The Ottery Group included as Exhibit F, this kiln is not on the National Register of Historic Places. Regardless, there will be no impacts, visual or otherwise, on this kiln of apparent local historic interest. The Council is referred to the Application and Tabs 5 and 6 which include the NEPA report and 2008 correspondence to local officials including the local historical society which sought any comments on historic impacts. Of note, no formal response to those letters was ever received by The Ottery Group. More importantly, the SHPO which actually conducted field visits, made a "No Adverse Effect" determination for purposes of Section 106 of the National Historic Preservation Act and any national and state historic resources in the area of the proposed tower facility.
- Q8. Provide C Squared drive data collected on the AT&T network in this area of Woodbridge.
- A8. Attached in Exhibit G is a map prepared on February 8, 2010 which incorporates C Squared's drive data that was collected on a date just prior to the public hearing in this Docket and which further demonstrates the significant gaps in AT&T's network in this area of Woodbridge and Bethany.

CERTIFICATE OF SERVICE

I hereby certify that on this day, a copy of the foregoing was sent to the Connecticut Siting Council electronically and by overnight delivery on March 12, 2010:

Dated: March 12, 2010



Handwritten signature of Christopher B. Fisher in black ink, written over a horizontal line.

Christopher B. Fisher

- cc: Michele Briggs, AT&T
John Blevins, AT&T
Anthony Wells, C Squared
Kevin Dey, SAI
Peter Perkins, P.E., CHA

EXHIBIT A

CUDDY & FEDER LLP

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January 29, 2010

Mr. John R. Morrisette
Manager Transmission Siting & Permitting
Northeast Utilities Service Company
107 Selden Street
Berlin, Connecticut 06037

Re: New Cingular Wireless PCS, LLC ("AT&T")
Woodbridge, Connecticut
Siting Council Docket No. 388

Dear Mr. Morrisette:

It was a pleasure speaking with you and your colleagues last week regarding the above referenced matter. As I mentioned on the telephone, Mr. Robert Gray and others within Connecticut Light and Power ("CL&P") have been very helpful with respect to AT&T's efforts to learn more about CL&P's siting policies and the limitations on AT&T's ability to utilize various transmission infrastructure in the State of Connecticut as antenna support structures. Indeed, our client was able to effectively testify before the Siting Council in this regard with information previously provided by CL&P and generally within its knowledge having worked with CL&P on joint projects for numerous years.

Nevertheless and as we discussed, the Siting Council has requested that we endeavor to obtain additional information from CL&P and Northeast Utilities as its parent corporation. Some specifically relates to CL&P's transmission infrastructure along State Route 69 in the Town of Woodbridge and other to various policies CL&P may maintain related to its infrastructure generally. In this regard, we are seeking additional information regarding the following:

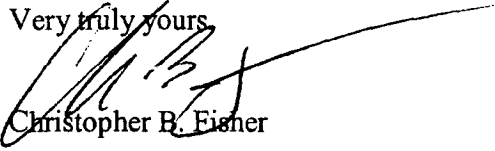
- 1) The status of the two 115 kv circuits and one 345 kv circuit on transmission structures located in a right-of-way near State Route 69 in the Town of Woodbridge as approved in Siting Council Docket 272. The Council is specifically looking for information on the CL&P rating system as it relates to CL&P's transmission reliability requirements for this infrastructure.
- 2) The CL&P terms and conditions upon which a replacement transmission tower might be constructed by AT&T in this specific right-of-way near its overpass on Dillon Road including costs, outage requirements and timing of same. Of note, AT&T would require an approximately 170' structure at a ground elevation around 300' AMSL.
- 3) Whether construction of a stand alone telecommunications tower site within CL&P's transmission right-of-way is permitted by CL&P.

- 4) Any CL&P policy(ies) related to construction of stand alone telecommunication towers on private parcels adjacent to CL&P transmission lines (i.e. setback requests).

We recognize that CL&P is not a party or intervenor to this proceeding pending before the Siting Council. Further, our office is keenly aware of your obligations and regulations that potentially limit disclosure of various information as it relates to any critical infrastructure maintained by CL&P. Thus, we would simply ask that CL&P provide AT&T with information to the extent possible so that we may further explain to the Siting Council why use of CL&P's infrastructure in this part of the State is not feasible for AT&T in the development of its own critical infrastructure needed for the reliable provision of wireless services to the public.

Thank you for your assistance and consideration.

Very truly yours,


Christopher B. Fisher

cc: Hon. Daniel Caruso, Chairman of the Connecticut Siting Council
Robert Golden, Esq.
Michele Briggs, AT&T



**Northeast
Utilities System**

107 Selden Street, Berlin CT 06037

Northeast Utilities Service Company
P.O. Box 270
Hartford, CT 06141-0270
(860) 665-2036

February 19, 2010

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

Re: New Cingular Wireless PCS, LLC ("AT&T"); Connecticut Siting Council Docket No. 388

Dear Attorney Fisher:

This letter is in response to your letter dated January 29, 2010, where you requested responses to questions that the Connecticut Siting Council ("Council") asked AT&T to pose to CL&P in the Council's Docket No. 388 proceedings. CL&P is not a participant in that Docket where AT&T is seeking a certificate to construct a cellular telecommunications tower and associated facilities in Woodbridge, Connecticut. You have posed four questions that CL&P has endeavored to answer given its limited knowledge of the proceedings and other concerns explained more fully in CL&P's specific responses below.

- 1) The Status of the two 115 kV circuits and one 345 kV circuit on transmission structures located in a right-of-way near State Route 69 in the Town of Woodbridge as approved in the Siting Council Docket 272. The Council is specifically looking for information on the CL&P rating system as it relates to CL&P's transmission reliability requirements for this infrastructure.**

CL&P is somewhat constrained to set out its criteria of rating these circuits due to heightened security concerns. In recent years, various federal and regional regulatory schemes have been developed to protect America's energy infrastructure of which the Council is very aware. See Docket 346, Implementation of Section 8 and Section 54 of Public Act No. 07-242 An Act Concerning Electricity and Energy Efficiency, White Paper on Security of Siting Energy Facilities, October 8, 2009. Information that may have been available to the general public in the past is now considered Critical Energy Infrastructure Information or "CEII." In public proceedings where CL&P is a party, CEII information is shared only pursuant to a protective order. Without declaring that the information you are seeking qualifies as CEII, CL&P prefers to proceed cautiously when discussing the underlying analysis that might reveal vulnerabilities that earned these circuits the following numerical ratings (i.e., the greater the number the less likely or longer lead-time to be granted a planned outage). These ratings are intended to be a prediction of the probability of obtaining an outage from CONVEX. CL&P believes the existing public record provides sufficient insight into the reasons for the assignment of the elevated outage ratings for these circuits. CL&P is most concerned about having these ratings identified in the public record.

CL&P's current Outage Availability Ratings are:

- "1" Rating:** Circuits with no significant impact to the Bulk Power System reliability, although still important for local supply, can be considered the best candidates for third-party attachments.
- "2" Rating:** Higher priority circuits, outages which significantly impact the Bulk Power System under favorable conditions. These circuits can usually be considered with conditions for a third party attachment.
- "3" Rating:** Even higher priority circuits, outages which substantially impact the Bulk Power System. Scheduling of outages can be difficult, experience delays and numerous rescheduling of the outage is common place for third-party attachments.
- "4" Rating:** Critical circuits to the New England Bulk Power System. Outage requests are extremely difficult to schedule and these circuits are not recommended to be considered for third-party attachments.

The subject 345-kV line holds the maximum Outage Availability Rating. The assessment of these circuits includes the impact on reliability, labor resources, and costs, such as PCS construction and CL&P switching/grounding cancellations and reschedulings and the congestion cost while the circuit is out of service. The 115-kV circuits hold a slightly lower rating but the need to keep them in service is still high. The 345-kV lines in the area that you describe are a component of the Middletown to Norwalk line that is a companion to the Bethel to Norwalk 345-kV line. These lines were certificated in the Council's Dockets 272 and 217, respectively. They form a 345-kV loop, in addition to the existing 115-kV lines serving southwestern Connecticut ("SWCT"), to make up the difference between load and available economic generation within the SWCT load pocket. In evaluating the gravity of any interruption in the subject lines, CL&P and CONVEX place great weight on increased reliability risks and congestion charges to Connecticut ratepayers from uneconomic local generation.

- 2) **The CL&P terms and conditions upon which a replacement transmission tower might be constructed by AT&T in this specific right-of-way ("ROW") near its overpass on Dillon Road including costs, outage requirements and timing of same. Of note, AT&T would require an approximately 170' structure at a ground elevation around 300' AMSL.**

Except in conjunction with a project to install a new transmission circuit, it is not CL&P's practice to replace an existing steel transmission structure for the sole purpose of attaching a third-party cellular antenna. When considering any structure replacement the long-term and short-term impacts on the transmission grid must be carefully considered. The short-term impact can be best described as the amount of time that the circuit would be "out-of-service" to perform the installation. Lengthy outages of the 345-kV lines to replace a structure may come with a significant congestion cost. While difficult to predict accurately without knowing the timing and duration of the outages needed, the SWCT projects have saved consumers about \$150 million per year in congestion costs. The long-term impact is the effect that the cellular equipment has

over the life of the structure; this includes the need for future outages of circuits for the cellular equipment's maintenance and repair. CL&P considers the replacement of single-circuit wood structures, but it does not consider replacement of multi-circuit steel poles or lattice towers for the sole purpose of attaching third-party equipment.

STRUCTURE REPLACEMENT CONSIDERATIONS:

- Circuit outage duration required.
- Lattice towers and steel poles are typically double-circuit structures; this requires an extended outage on two parallel circuits.
- Lattice steel towers are no longer produced in the U.S. and long outage durations are required for their assembly and construction.
- Steel poles and lattice towers usually require extensive foundation work resulting in additional outage time.
- Increase in costs associated with the engineering, design, environmental analysis and regulatory approval.

CL&P considers replacing an existing steel pole or lattice tower with a joint-use structure only in conjunction with the construction of a new circuit.

3) Whether construction of a stand alone telecommunications tower site within CL&P's transmission right-of-way is permitted by CL&P

New independent telecommunication structures within CL&P rights-of-way ("ROWS") would generally be unacceptable. AT&T is proposing a 170' tower engineered to only hold antennae belonging to AT&T (with space for future tower sharing with other cell service providers) that would also require a 75' by 75' fenced area for associated cell service facilities. Such a facility could not be built on the existing ROW that you inquired about in Woodbridge.

Most ROWs are fully, or nearly fully occupied with transmission and distribution facilities, with room along the edges sufficient only for required electrical clearances. Where presently unused widths do exist, these widths are reserved for future power lines, and single location bottleneck constraint imposed by another type of facility would restrict the future use of long sections of right-of-way.

Access to both transmission structures and work areas around structures by CL&P vehicles must be maintained; therefore, travel ways must not be blocked or their use limited. Any joint use request that significantly limits CL&P from exercising its rights within the transmission corridor will not be acceptable. Minimum horizontal and vertical distance criteria must be maintained as detailed below.

In addition, the installation within CL&P's ROW of a new, stand-alone telecommunication structure that is unrelated to the electric utility industry could constitute an impermissible over-burdening of CL&P's ROW. See *Zhang v. Omnipoint, Inc.*, 272 Conn. 627, 640 & fn.8, 866 A.2d 588 (2005) (holding that the trial court on remand must examine whether or not Omnipoint, Inc.'s installation in CL&P's ROW of telecommunications equipment, which is unrelated to the electric utility industry, constitutes an impermissible over-burdening of CL&P's 1923

transmission ROW near Morehouse Drive in Fairfield). This legal concern provides an additional, independent justification for CL&P's objection to the proposed installation within its ROW of a new, stand-alone telecommunication structure that is unrelated to the electric utility industry.

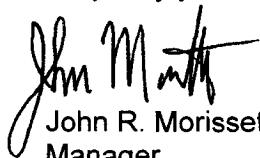
4) Any CL&P policy(ies) related to construction of stand alone telecommunication towers on private parcels adjacent to CL&P transmission lines (i.e. setback requests)

No. CL&P does not have the right to restrict development on property in which it does not have a property interest. However, it would encourage tower developers to observe the same criteria that CL&P uses for a telecommunication tower it owns near a CL&P transmission facility.

The most desirable locations would be those for which the radius of an unguyed structure failing at its base would not contact the nearest conductor that is currently installed within the right-of-way, or in the case of an unused width, a conductor that might be installed there in the future. Should that placement not be possible, another acceptable approach would be to install a structure specifically designed, in the event of a failure, for failure at some point above the ground, and the length of the upper portion is such that its falling radius would miss the nearest conductor that is currently located on the ROW or might be located on the ROW in the future. The design of the structure should be based upon ANSI/TIA/EIA 222-F Standard, "Structural Standards For Steel Antenna Towers and Antenna Supporting Structures," as amended from time to time, except that a 85-MPH Basic Wind Speed should be considered for all CL&P locations, and the allowable stresses should not be increased by 1/3 (that is, TIA Section 3.1.1.1. is disallowed).

I hope the above responses to the questions you posed are helpful and provide useful information to the Council.

Very truly yours,



John R. Morissette
Manager
Transmission Siting and Permitting

JRM:lpc

cc: First Selectman Edward Sheehy

The Connecticut Light and Power Company
Docket No. F-08

Data Request CSC-01
Dated: 06/12/2008
Q-CSC-011
Page 1 of 1

Witness: Raymond L. Gagnon
Request from: Connecticut Siting Council

Question:

Regarding the installation of wireless (i.e. cellular and PCS) antennas on electric transmission structures (often referred to as "power mount facilities"), does CL&P have any concerns regarding this process? For example, in CL&P's experience, does the carriers' need to access the facilities for maintenance and upgrades sometimes conflict with CL&P's ability to schedule transmission outages with ISO-New England? Explain.

Response:

CL&P is concerned that the wireless antenna process does not fully consider electric reliability issues. To ensure safe, reliable and economic operation of the transmission system, CL&P actively discourages wireless antenna installations on high impact lines, such as 345-kV lines, radial 115-kV lines and lines that limit the ability for the system or a part of the system to transfer power. However, once a request is made, CL&P makes every effort to support wireless antenna installations and maintenance requests.

The installation or maintenance of such equipment requires that the transmission line be switched out of service for a period of time ranging from several hours to several days to create a safe working environment for the wireless communication crews. The ability to get the transmission line switched out of service is dependent on the transmission network's capability to continually support the load demand with that particular line out of service.

Outage requests are submitted to the Connecticut Valley Electric Exchange (CONVEX) and ISO-NE (Independent System Operator - New England) for evaluation and approval. The degree to which a line is able to be taken out of service is dependent on its impact on the reliable operation of the transmission system. Some of the characteristics of lines with high impact are 345-kV lines, radial 115-kV lines and lines that limit the ability for the system or a part of the system to transfer power. Additionally, there are real time conditions such as generation availability, system disturbances or unexpected loading conditions that directly impact the ability to take a line out of service.

CONVEX is the local transmission operations control center for Connecticut and Massachusetts under the umbrella of the New England Regional Transmission Operator known as ISO-NE. As a Transmission Operator, CONVEX's primary function is to ensure the safe, reliable and economic operation of the CONVEX transmission system, 24 hours a day, 365 days a year, no matter what the conditions. This responsibility is carried out in conjunction with ISO-NE by evaluating, coordinating, and responding to planned and dynamic changes in the connectivity of the transmission system, ensuring that reliable service to the electrical distribution system is maintained at all times.

CONVEX and ISO-NE are the local and regional authorities that approve outage request. Therefore, CL&P cannot guarantee that a line outage can be obtained in a timely manner to support the carriers' need to access transmission line structures for wireless antenna installations, maintenance and upgrades.

The Connecticut Light and Power Company
Docket No. F-08

Data Request CSC-01
Dated: 06/12/2008
Q-CSC-012
Page 1 of 1

Witness: Raymond L. Gagnon
Request from: Connecticut Siting Council

Question:

Did CL&P experience a recent transmission outage in the Danbury area? If yes, identify the circuit and circumstance of the occurrence.

Response:

Yes, CL&P experienced a transmission outage in the Danbury area on May 27, 2008 affecting 56,400 customers. While the transmission system was restored in less than one hour, many downstream distribution customers were out of power for 24 hours.

On the morning of May 27, 2008, CL&P took the 1770 line out of service to install a wireless antenna attachment. The 1770 line runs from Bates Rock substation in Southbury to Plumtree substation in Bethel via Stony Hill substation in Brookfield. This left the Danbury area fed radially on the 1238/1813 (115-kV) line which runs from Frost Bridge to Rocky River. Later that morning a weather forecast of impending weather approaching the area was reported and a decision to cancel the wireless antenna installation and place the 1770 line back into service was made. During the restoration effort of the 1770 line the 1238/1813 (115-kV) sustained a lightning disturbance resulting in loss of this radial transmission feed into the Danbury area. The loss of the Frost Bridge (1238/1813 line) source with the Plumtree source (1770 line) out of service resulted in 56,400 customer outages which lasted longer than one hour. Within one hour, 28 MW of the initial 130 MW load was restored; restoration of the remaining load was estimated to be 24 hours.

EXHIBIT B

Tony Wells
 C Squared Systems
 920 Candia Road
 Manchester, NH 03109
 603-657-9702
 Tony.Wells@csquaredsystems.com



March 4, 2010

Connecticut Siting Council

Subject: CSC Docket 388 – New Cingular Wireless, Woodbridge, CT

Dear Connecticut Siting Council:

C Squared Systems was retained by New Cingular Wireless to investigate the extent of coverage that could be potentially obtained from utilizing the UI (United Illuminating) transmission power poles in the vicinity of the proposed site located at 1990 Litchfield Turnpike, Woodbridge, CT as possible alternatives to the proposed site.

The coverage objective for the proposed site consists of, but is not limited to; 2.0 mile gap in coverage on State Hwy 63 west of the proposed site, 0.4 mile coverage gap on State Hwy 67 and a 1.3 mile gap on State Hwy 69 (Litchfield Turnpike), as well as the businesses and residences in this area and along these routes.

Two possible UI poles were identified to be analyzed as alternatives to the proposed tower as listed in the below table and located on the attached map.

Location	Coordinates	Height Analyzed *	Results		
			State Hwy 63	State Hwy 67	State Hwy 69
E-W UI Power Line Crossing At Litchfield Turnpike	41-22-51.5 N	50' AGL	Leaves 2.0 mile gap	Leaves 0.4 mile gap	Leaves 0.3 mile gap
	72-58-30.6 W				
WRRSP (West Rock Ridge State Park) UI Pole Line	41-22-46.5 N	50' AGL	Leaves 0.6 mile gap	Leaves 0.3 mile gap	Leaves 0.04 mile gap
	72-58-06.2 W				

* The UI lines in this area are on relatively short wooden pole structures. They were analyzed at an assumed maximum height of 50 feet above ground level.

Summary: The UI pole locations noted above do not provide suitable replacement coverage to the proposed wireless tower located at 1990 Litchfield Turnpike. Mounting on power line structures also introduces additional difficulties such as access to the sites and scheduling power line outages for installation, maintenance and repair of the wireless system.

Sincerely,

Anthony Wells
 Managing Partner

**TAX MAP
10.2
OF
WOODBIDGE
CONNECTICUT**

LEGEND

- PROPERTY LINE
- DEVELOPER'S LOT LINE
- RIGHT-OF-WAY
- PROPOSED ROAD
- MATCH LINE
- 3 PARCEL NUMBER
- 66.35 AC PARCEL AREA
- 100 DIMENSIONS
- 100'- SCALE DIMENSIO
- 11620 COORDINATE
- P10 PART OF PARCEL
- (75) SURVEY LOT NO.
- P POOLS
- - - BOG LINE
- - - CITY/TOWN LIMIT
- - - RAILROAD
- - - RIGHT-OF-WAY
- - - EASEMENT
- - - HYDROLOGY

THIS MAP IS PREPARED FOR THE REVENUE DEPARTMENT OF THE STATE OF CONNECTICUT AND IS NOT TO BE USED FOR ANY OTHER PURPOSE WITHOUT THE WRITTEN PERMISSION OF THE REVENUE DEPARTMENT. THE REVENUE DEPARTMENT IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS THAT MAY APPEAR HEREON. THE USER OF THIS MAP SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY RECORDS AND INFORMATION FROM THE APPROPRIATE AGENCIES. THE REVENUE DEPARTMENT IS NOT RESPONSIBLE FOR ANY DAMAGES OF ANY KIND THAT MAY BE INCURRED BY THE USER OF THIS MAP. THE USER OF THIS MAP SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY RECORDS AND INFORMATION FROM THE APPROPRIATE AGENCIES.

0.2	0.4	0.8
16.1		11.1
16.2	16.4	0.0

SCALE
COMPLETION DATE: DEC 1, 1998

DATE OF REVISION:

**TAX MAP
10.4
OF
WOODBIDGE
CONNECTICUT**

LEGEND

- PROPERTY LINE
- DEVELOPER'S LOT LINE
- RIGHT-OF-WAY
- PROPOSED ROAD
- MATCH LINE
- 3 PARCEL NUMBER
- 64.35 AC PARCEL AREA
- 100 DIMENSIONS
- 100'- SCALE DIMENSIO
- 11620 COORDINATE
- P10 PART OF PARCEL
- (75) SURVEY LOT NO.
- P POOLS
- - - BOG LINE
- - - CITY/TOWN LIMIT
- - - RAILROAD
- - - RIGHT-OF-WAY
- - - EASEMENT
- - - HYDROLOGY

THIS MAP IS PREPARED FOR THE REVENUE DEPARTMENT OF THE STATE OF CONNECTICUT AND IS NOT TO BE USED FOR ANY OTHER PURPOSE WITHOUT THE WRITTEN PERMISSION OF THE REVENUE DEPARTMENT. THE REVENUE DEPARTMENT IS NOT RESPONSIBLE FOR ANY ERRORS OR OMISSIONS THAT MAY APPEAR HEREON. THE USER OF THIS MAP SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY RECORDS AND INFORMATION FROM THE APPROPRIATE AGENCIES. THE REVENUE DEPARTMENT IS NOT RESPONSIBLE FOR ANY DAMAGES OF ANY KIND THAT MAY BE INCURRED BY THE USER OF THIS MAP. THE USER OF THIS MAP SHALL BE RESPONSIBLE FOR OBTAINING ALL NECESSARY RECORDS AND INFORMATION FROM THE APPROPRIATE AGENCIES.

		11.1

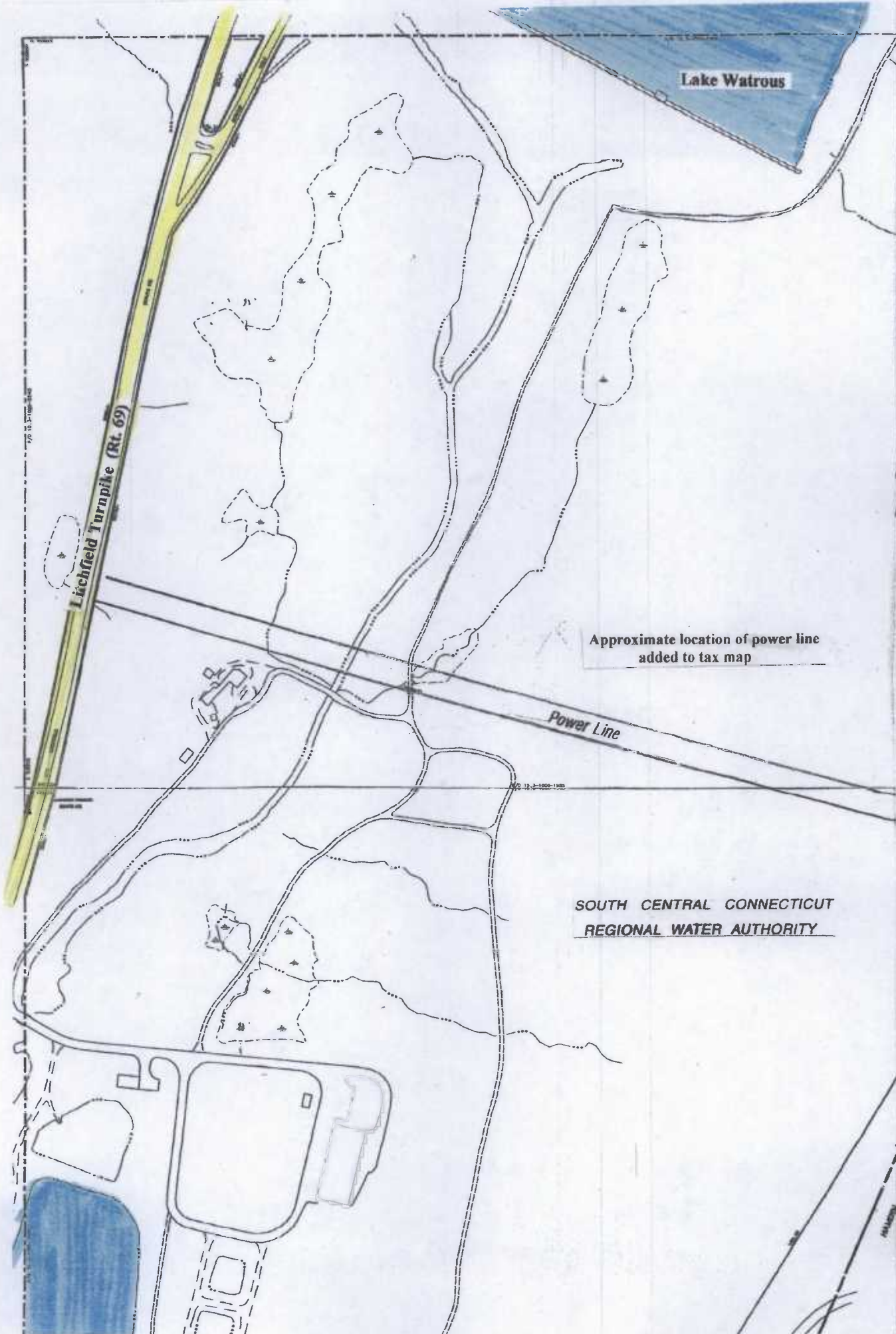


EXHIBIT C

Fisher, Christopher

From: Dianne Tompkins [dtompkins@rwater.com]
Sent: Wednesday, January 27, 2010 10:29 AM
To: Fisher, Christopher
Cc: Tom Chaplik
Subject: RE: West River System/Lake Dawson Reservoir

We have no objection to your including the e-mail.

From: Fisher, Christopher [mailto:CFisher@CUDDYFEDER.COM]
Sent: Wednesday, January 27, 2010 10:22 AM
To: Dianne Tompkins
Cc: Tom Chaplik
Subject: RE: West River System/Lake Dawson Reservoir

Ms. Tompkins,

Thank you for your prompt response to my inquiry.

As you probably know, AT&T has utilized many water tank structures throughout the State as antenna support structures where they are of sufficient height and location for providing service to the public. Unfortunately, in this case the Authority's plant and ancillary infrastructure is at the bottom of the valley and not tall enough to support AT&T's equipment needed to serve portions of State Routes 69, 63 and the surrounding area. In looking at the USGS maps for the area, the Authority's plant is below 200' AMSL whereas AT&T's proposed tower facility is at 290' AMSL and proposed at 170' AGL (i.e., antenna height of +460' AMSL). As such, it just is not feasible in this case to put antennas on top of the Authority's facilities near Lake Dawson, but I do appreciate your identifying the Authority's process for that.

Since I need to correspond with the State Agency, would it be OK with you if I simply attach this email correspondence to my submission and confirming the lack of Class III holdings in the area?

Thank you for your assistance in this regard.

From: Dianne Tompkins [mailto:dtompkins@rwater.com]
Sent: Wednesday, January 27, 2010 8:52 AM
To: Fisher, Christopher
Cc: Tom Chaplik
Subject: RE: West River System/Lake Dawson Reservoir

Dear Mr. Fisher,
It is true that the State Department of Public Health does not allow the construction of cell towers on Class I or II lands. The Authority's landholdings in the area in question are Class I and II. However, if a cell tower was attached to an existing structure this does not require DPH approval. But – this would require an amendment to the Authority's Land Use Plan and approval of the Authority's Boards requiring the preparation and submittal of an application to these Board and may or may not necessitate a public hearing to be determined by the Boards. As you are aware the Authority does have a treatment plant, pump station and two houses in this general area.

Dianne L. Tompkins

Senior Land Use Manager
Regional Water Authority
e-mail: dtompkins!@rwater.com

From: ask.land
Sent: Tuesday, January 26, 2010 2:54 PM
To: Dianne Tompkins
Subject: FW: West River System/Lake Dawson Reservoir

I sent to Ron and he said to send to you.

From: Fisher, Christopher [<mailto:CFisher@CUDDYFEDER.COM>]
Sent: Tuesday, January 26, 2010 2:33 PM
To: ask.land
Subject: West River System/Lake Dawson Reservoir

I'm looking for contact information within SCCRWA regarding lands in the West River System/Lake Dawson Reservoir area and their status as Class I, II or III Watershed. Specifically, I represent AT&T which has a pending proceeding before a State agency on a private parcel of land and we were recently asked if any of the SCCRWA holdings in the area in and around the filtration plant on Dillon Road were available properties for use as a cell tower site. As counsel, I am aware that Class I and II lands are legally barred for such use by State statute and as such am trying to narrow down and determine if any properties in the valley along State Route 69 (Litchfield Turnpike) are Class III and if so, would they be available for use as a possible cell tower site. Please let me know how I might direct a letter to SCCRWA in this regard. Thank you.

CHRISTOPHER B. FISHER

CUDDY&

FEDER LLP

ATTORNEYS AT LAW

445 Hamilton Avenue, 14th Floor

White Plains, New York 10601

Telephone: 914.761.1300

Facsimile: 914.761.5372

E-mail: cfisher@cuddyfeder.com

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Lake Watrous

Litchfield Turnpike (RI 69)

Spry Brook

Power Line

69

SOUTH CENTRAL CONNECTICUT
REGIONAL WATER AUTHORITY

Dillon Rd

Lake Dawson

Image U.S. Geological Survey
©2010 Google

Google

Imagery Date: Mar 31, 2009

43° 51' 35" N 72° 58' 14" W Elev: 223 ft

Eye alt 4984 ft

EXHIBIT D



- Historic Sites:**
- 101 CASTLE DR. ANDREW HOUSE
 - 102 DARLING HOUSE
 - 103 WOODBRIDGE GREEN HISTORIC DISTRICT
 - 104 WHEELER-BECKER HOUSE
 - 105 NEW ENGLAND CEMENT COMPANY KILN AND QUARRY

- Parks:**
- 106 WEST ROCK RIDGE STATE PARK
 - 107 ALICE NEWTON STREET MEMORIAL PARK
 - 108 WEST ROCK PARK

- Trails:**
- 109 BALDENS BROOK TRAIL
 - 110 REGIONAL WATER AUTHORITY TRAILS
 - 111 BISHOP WEST TRAILS
 - 112 BISHOP ESTATE/DARLING HOUSE TRAILS

- Schools:**
- 113 ALICE NEWTON STREET MEMORIAL PARK TRAILS
 - 114 WEST ROCK RIDGE STATE PARK TRAILS
 - 115 BEHANY FARMS TRAILS

- Schools:**
- 116 CHILDREN'S GARDEN DAYCARE
 - 117 TRINITY COMMUNITY PRE-SCHOOL
 - 118 VELADIM CHILD CARE & JEWISH COMMUNITY CENTER
 - 119 AMITY REGIONAL SENIOR HIGH SCHOOL

- Church/Cemetery:**
- 120 ASSUMPTION CHURCH
 - 121 TRINITY EVANGELICAL FREE CHURCH
 - 122 MT. SINAI MEMORIAL CEMETERY
 - 123 SPERRY CEMETERY

Visibility by Residence

STREET	RESIDENCES
LITCHFIELD TPKE	4 (Y), 1 (S)

(S) = SEASONAL VIEW
(Y) = YEAR ROUND VIEW



NOTES:

- Only visible areas are shown on the map utilizing the process described in note 2. The remainder of the map has been estimated to be nonvisible utilizing the process described in note 3.
- Seasonal and year round areas of visibility were estimated from a field visual analysis within public R.O.W. and public properties. Areas shown on private property were interpolated from the field visual analysis.
- Nonvisible areas were estimated from a computer generated topography & vegetation analysis and field verification of vegetation & building screening within public R.O.W and public properties. Vegetation limits were determined from 2004 aerial photos and is assumed to be 65' high. Verification of vegetation height, coverage, and type within private areas not visible from public R.O.W or public properties was not field verified.
- Historical areas were determined from national and state historical registers.
- Parks, schools, cemeteries, and churches were determined from street maps and field observations.
- Scenic roads, if any, were determined from the CTDOT list of designated scenic roads and field observations.

Legend

APPROXIMATE LOCATION OF PROPOSED MONOPOLE	COMPUTER SIMULATION PHOTOGRAPH LOCATION
APPROXIMATE LIMIT OF SEASONAL TOWER VISIBILITY	APPROXIMATE LIMIT OF YEAR ROUND TOWER VISIBILITY
CHURCH/CEMETERY	PARK
HISTORICAL SITE	SCHOOL
TRAIL OR SCENIC ROAD	

Visibility by Acreage

ITEM	APPROXIMATE ACRES	% OF TOTAL AREA
2 MILE RADIUS AREA	8,053	100%
NOT VISIBLE DUE TO TOPOGRAPHY	4,188	52.0%
NOT VISIBLE DUE TO VEGETATION	3,614	44.9%
VISIBLE YEAR ROUND	223.75	2.76%
POTENTIAL SEASONAL VISIBILITY	27.25	0.34%

Distances from Photo Locations to Tower

PHOTO	DIST. (FT)	PHOTO	DIST. (FT)	PHOTO	DIST. (FT)	PHOTO	DIST. (FT)
01	4,225	04	9,540	07	6,560	10	6,690
02	2,170	05	4,630	08	6,790	11	4,650
03	4,140	06	5,090	09	2,550	12	10,460

**2 MILE VIEWSHED ANALYSIS MAP
160' TOWER**

NOTE: THE DROP FROM 170' TO 160' CHANGED THE AREAS NEAR VIEWS 3 AND 5 FROM YEAR ROUND TO SEASONAL

**WOODBRIDGE FARM #1
VISUAL IMPACT ASSESSMENT**

PREPARED BY

NEW CINGULAR WIRELESS, P.O. BOX 1100, WASHINGTON, DC 20036

PREPARED BY

2138 Hill Street Highway, Suite 212, Rocky Hill, CT 06067-2538
Phone: (860) 267-0207 www.cia-consultants.com

CIA Project No. 1400-001-0001

MARCH 2009

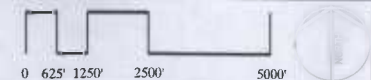


FIGURE VS-1

EXHIBIT E

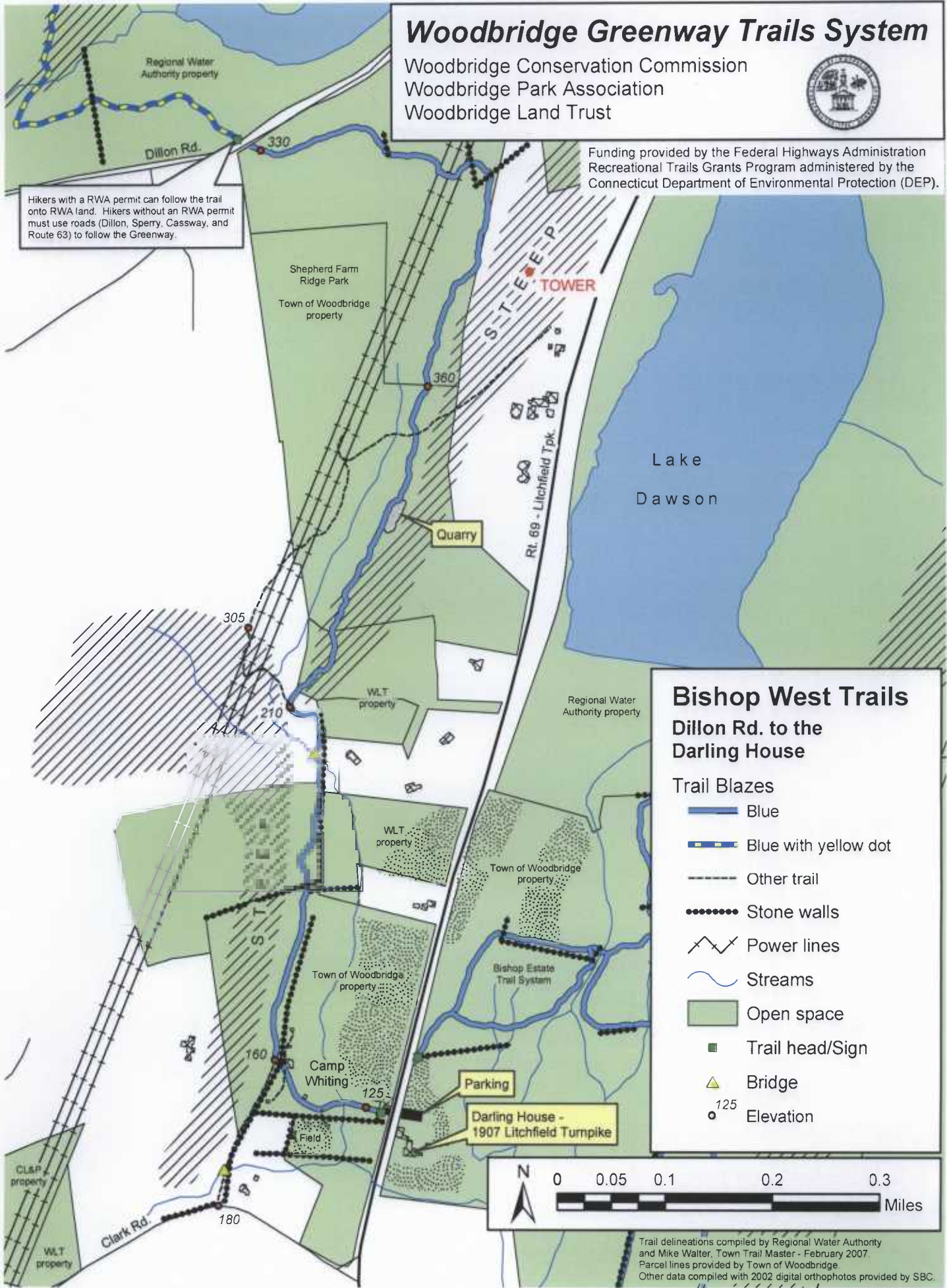
Woodbridge Greenway Trails System

Woodbridge Conservation Commission
 Woodbridge Park Association
 Woodbridge Land Trust



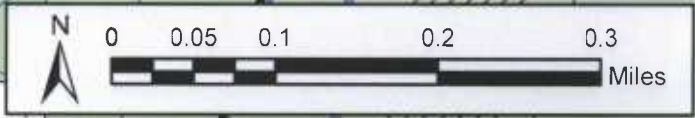
Funding provided by the Federal Highways Administration
 Recreational Trails Grants Program administered by the
 Connecticut Department of Environmental Protection (DEP).

Hikers with a RWA permit can follow the trail onto RWA land. Hikers without an RWA permit must use roads (Dillon, Sperry, Cassway, and Route 63) to follow the Greenway.



Bishop West Trails Dillon Rd. to the Darling House

- Trail Blazes**
- Blue
 - Blue with yellow dot
 - Other trail
 - Stone walls
 - Power lines
 - Streams
 - Open space
 - Trail head/Sign
 - Bridge
 - Elevation



Trail delineations compiled by Regional Water Authority and Mike Walter, Town Trail Master - February 2007.
 Parcel lines provided by Town of Woodbridge.
 Other data compiled with 2002 digital orthophotos provided by SBC.

EXHIBIT F



THE OTTERY GROUP

March 3, 2010

Daniel M. Laub
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, New York 1060

Re: New England Cement Company Kiln and Quarry –Litchfield Turnpike, Woodbridge, CT

Mr. Laub:

This letter serves to address the location of the New England Cement Company Kiln and Quarry and the potential existence of a second kiln along the Litchfield Turnpike, in Woodbridge. As the address of the site is listed as “restricted” on the National Register Database, determining the location of the site required consultation with the Connecticut Commission on Culture & Tourism, Historic Preservation and Museum Division (SHPO) as well as review of historic maps and aerial images. The information we have received from Susan Chandler at the SHPO places the resource on the east side of the Litchfield Turnpike (Route 69) near the intersection with Dillon Road. Information you provided me, along with research on the town of Woodbridge, provided evidence of another kiln and quarry site on the west side of Route 69, north of Dillon Road. A history of Woodbridge written in 1911 describes the remains of kilns on the hillside opposite Lake Dawson and of a short-lived cement manufacturing business in the area. A survey of historic resources within Woodbridge conducted in 1995 did not include the description of kilns or cement manufacturing on either side of the Litchfield Turnpike. Historic mapping and aeriels have been inconclusive in determining the exact location of the site. While the remains of the kilns demonstrate the presence of cement manufacturing on the west side of Route 69, this site has not been evaluated for or listed on the National Register of Historic Places. Based on the information from the SHPO, it was determined that the site listed on the National Register is located on the east side of Route 69 near the intersection with Dillon Road.

The Section 106 review of the Woodbridge site was initially sent to the SHPO in October of 2008 with the location of the New England Cement Company Kiln and Quarry site mapped on the east side of Route 69 near the intersection with Dillon Road. Records indicated that the property was owned by the Regional Water Authority, located by the intersection of Route 69 and Dillon Road. In January of 2009 the SHPO returned a No Adverse Effect determination with no mention of the Kiln and Quarry site being incorrectly mapped. In June of 2009 the site was resubmitted to the SHPO for review with a height change. Once again the Kiln and Quarry were mapped on the east side of Route 69 and the SHPO returned a No Adverse Effects determination and made no comment regarding the location of the kiln and quarry. At a January 2010 Connecticut Siting Council Meeting, community members discussed the presence of a kiln on the west side of Route 69, north of Dillon Road. This issue was addressed with Susan Chandler at the SHPO and it was confirmed that their records place the National Register-listed kiln on the east side of Route 69.

The Nationwide Programmatic Agreement of 2004, which governs SHPO review of FCC-related projects, defines a “historic property” as “any prehistoric or historic district, site, building, structure, or object included in, or eligible for inclusion in, the National Register maintained by the Secretary of the Interior.” In order to identify historic properties, applicants are required to “review such records only to the extent they are available at the offices of the SHPO or can be found in publicly available sources identified by the SHPO.” In identifying these properties “applicants are not required to undertake a field survey or other measures other than reviewing these records in order to identify historic properties.” The SHPO may identify additional properties that are considered eligible for listing on the National Register or which no longer qualify for inclusion on

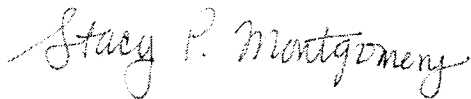
THE OTTERY GROUP

the National Register and in addition, consulting parties may contribute comments on the effects of the planned undertaking on historic properties. According to Susan Chandler, no such comments were received by the SHPO during Section 106 consultation. While the impact on locally significant sites is important, the Section 106 review process as implemented by the Programmatic Agreement limits the scope of the review by the SHPO. As the site on the west side of Route 69 has only been identified locally, it would not fall under the purview of Section 106 review.

The New England Cement Company Kiln and Quarry site is listed on the National Register under Criterion A, for its contributions to American industrial history. There will be no direct effects to the historic buildings; impacts would be limited to visual effects of the tower. Although portions of the proposed tower may be visible from some vantage points on the listed property, or from the intersection of Dillon Road and Route 69, surrounding vegetation and local topography should diminish any visual intrusion. As a result, significant historic features of the New England Cement Company Kiln and Quarry and other nearby kilns will not be impacted. The SHPO has provided two letters with a No Adverse Effects determination, and has confirmed this decision while aware of the issue regarding the New England Cement Company Kiln and Quarry. Since the SHPO has concurred that the undertaking will have no adverse effect on the New England Cement Company Kiln and Quarry, the Section 106 review process is complete. Please note that this review was pursuant to Federal (FCC) requirements and does not preclude local historic review from providing comment or making requests from an applicant.

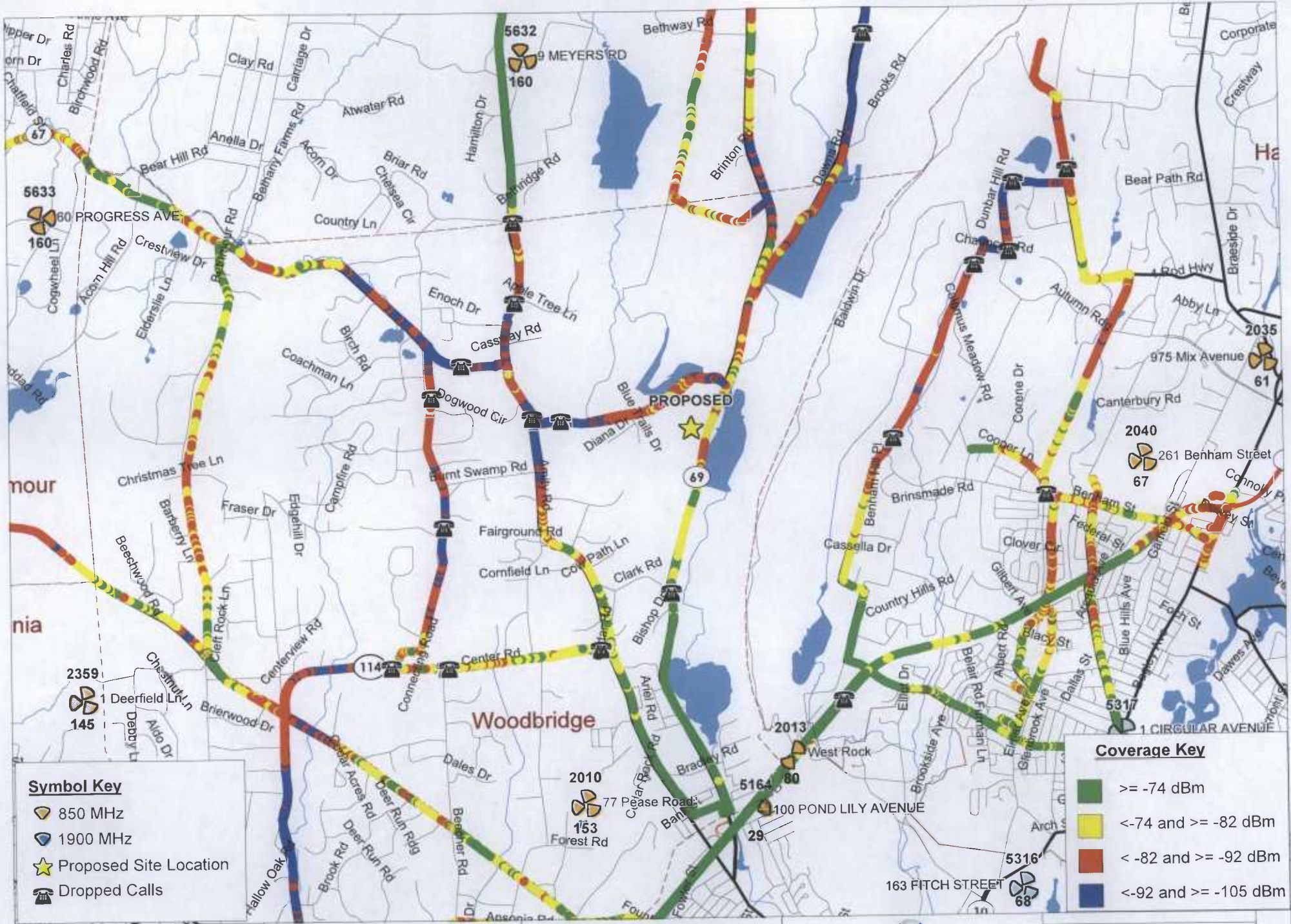
Sincerely,

THE OTTERY GROUP, INC.



Stacy P. Montgomery
Architectural Historian

EXHIBIT G



Symbol Key

- 850 MHz
- 1900 MHz
- Proposed Site Location
- Dropped Calls

Coverage Key

- >= -74 dBm
- <-74 and >= -82 dBm
- < -82 and >= -92 dBm
- <-92 and >= -105 dBm

Drive Test Data

Woodbridge, CT

1990 Litchfield Tpke
Woodbridge, CT



PREPARED ON
DATE: 02/08/2010

REV
9