

TAB 2

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

March 23, 2004

APPLICATION OF MESSAGE CENTER)	Docket 280
MANAGEMENT FOR A CERTIFICATE)	
OF ENVIRONMENTAL COMPATIBILITY AND)	
PUBLIC NEED FOR THE CONSTRUCTION,)	
MAINTENANCE, AND OPERATION OF A)	
WIRELESS TELECOMMUNICATIONS FACILITY)	
LOCATED AT THE CASELLA PROPERTY)	
EAST OF MAIN STREET (ROUTE 17),)	
GLASTONBURY, CONNECTICUT)	

WITHDRAWEL OF REQUEST TO INTERVENE

Southwestern Bell Mobile Systems, LLC d/b/a Cingular Wireless; LLC, ("SBMS") respectfully withdraws its Request to Intervene dated March 15, 2004. SBMS will not be intervening in Docket 280 of the Connecticut Siting Council at this time.

Respectfully Submitted



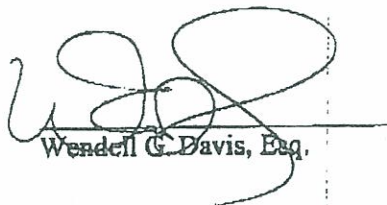
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CERTIFICATE OF SERVICE

The undersigned herein certifies that on March 23, 2004, an original and fifteen (15) copies of the foregoing was mailed, by first class mail, to the Connecticut Siting Council and each of the following parties of record:

Christopher B. Fisher, Esq.
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Message Center Management, Inc.



Wendell G. Davis, Esq.

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

Message Center Management, Inc. Application for a Certificate : Docket 280
of Environmental Compatibility And Public Need for the :
Construction, Maintenance and Operation of a Wireless :
Telecommunications Facility located at the Casella Property, east :
of Main Street, (Route 17), Glastonbury, Connecticut. :
: April 14, 2004

**REQUEST BY OMNIPOINT COMMUNICATIONS, INC.
TO INTERVENE IN THIS PROCEEDING**

Pursuant to Section 16-50n of the Connecticut General Statutes and Section 16-50j-15a of the Regulations of Connecticut State Agencies, Omnipoint Communications, Inc. ("T-Mobile") respectfully requests permission from the Connecticut Siting Council ("Council") to participate as an intervenor in the application and hearing process for Docket No. 280 concerning the above-captioned matter.

T-Mobile operates "Wideband PCS" licenses for the 2-Ghz PCS frequencies for the greater New York City area, including the entire State of Connecticut. Omnipoint is licensed by the Federal Communications Commission (FCC) to provide PCS wireless telecommunications service in Connecticut, which includes the area to be served by the proposed installation. T-Mobile has an interest in any certificate application process to aid the Council in evaluating the public interest considerations set forth in Section 16-50g and 16-50aa of the Connecticut General Statutes.

In the present docket, T-Mobile has an interest in sharing the use of a tower facility in the immediate area of the facility proposed in Docket No. 280 to address an existing gap in coverage in the Glastonbury and Portland areas. Unfortunately, T-Mobile cannot support the Applicant's prime facility location in that the prime location would result in a coverage gap

that would require additional T-Mobile facilities at an unnecessary additional expense. While there are other locations on the host property that would substantially improve coverage for T-Mobile and would avoid the need for additional facilities in this area, the Applicant has represented to T-Mobile that those locations are not available for a ground lease for a tower facility. T-Mobile therefore desires to intervene to assist the Council in identifying the appropriate height and location of a wireless tower facility that would suit its needs and avoid the unnecessary proliferation of additional tower facilities in the area. T-Mobile believes that the Council should use the proceedings in Docket No. 282 to explore whether the Applicant's prime location is the appropriate location for a tower facility and whether there are other locations nearby that would better provide wireless services in portions of Glastonbury and Portland.

The Council has admitted T-Mobile as intervenor in previous dockets and T-Mobile proposes to participate in this application in support of the need for an appropriately sited new tower facility in this area of the State. For all the foregoing reasons, T-Mobile respectfully requests that it be named an intervenor in this proceeding.

Dated: April 14, 2004

Hartford, Connecticut

Respectfully submitted,

OMNIPOINT COMMUNICATIONS, INC.

By: 

Its Counsel

Stephen J. Humes

LeBoeuf, Lamb, Greene & MacRae, LLP

Goodwin Square

225 Asylum Street

Hartford, CT 06103

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Request to Intervene in this Proceeding by T-Mobile, filed at the Connecticut Siting Council, was sent via first class mail, postage prepaid, this 14th day of April, 2004 to the attached Service List for Docket 280.



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