

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF T-MOBILE NORTHEAST, : DOCKET NO. 391
LLC FOR A CERTIFICATE OF : :
ENVIRONMENTAL COMPATIBILITY AND : :
PUBLIC NEED FOR THE CONSTRUCTION, : :
MAINTENANCE AND OPERATION OF A : :
TELECOMMUNICATIONS TOWER : :
FACILITY AT 232 SHORE ROAD, OLD : :
LYME, CONNECTICUT : OCTOBER 26, 2009

PETITION TO INTERVENE

Pursuant to Connecticut General Statutes (“C.G.S.”) Section 16-50n and Regulations of Connecticut State Agencies (“R.C.S.A.”) Section 16-50j-15a, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby requests permission of the Siting Council (“Council”) to participate, as an intervenor in the application and hearing process for Docket No. 391.

As the Council is aware, Cellco is a licensed provider of wireless services in New London County, Connecticut. The tower proposed in Docket No. 391 fits neatly into Cellco’s network design for New London County. Cellco may therefore be significantly affected by this proceeding. Cellco intends to install antennas at the 90-foot level on the proposed 100-foot monopole tower and a 12’ x 30’ shelter near the base of the tower to house its radio equipment and back-up generator.

Cellco has an interest in the hearing and in the pre-hearing process to aid the Council in evaluating the public interest and need considerations set forth in C.G.S. § 16-50g. Cellco’s expertise and experience in designing, constructing, operating and maintaining a wireless

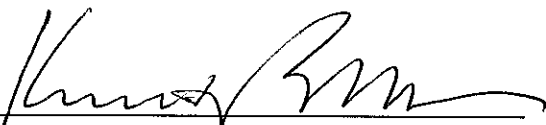
telecommunications system in the State of Connecticut in accordance with the rules and regulations of the Council, the Department of Public Utility Control and the Federal Communications Commission, may be of benefit to the Council in resolving issues presented in Docket No. 391. Cellco has been admitted as an intervenor in numerous prior Siting Council dockets.

Cellco proposes to participate in the hearing by cross-examining the Applicant's witnesses, offering oral and written testimony or evidence and filing pre-hearing interrogatories.

For the above-stated reasons, Cellco seeks permission to participate in this docket as an intervenor.

Respectfully submitted,


CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By 
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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of October, 2009, a copy of the foregoing was sent,
postage prepaid, to:

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