

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY T-MOBILE
NORTHEAST, LLC FOR A
CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 232 SHORE ROAD IN THE TOWN
OF OLD LYME, CONNECTICUT

DOCKET NO. 391

Date: January 28, 2010

**INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL
FROM APPLICANT T-MOBILE NORTHEAST, LLC**

The Applicant, T-Mobile Northeast, LLC ("T-Mobile"), submits the following responses to the second set of Pre-Hearing Interrogatories propounded by the Connecticut Siting Council in connection with the above-captioned Application.

1. T-Mobile Northeast, LLC's (T-Mobile) response to the Connecticut Siting Council's (Council) interrogatory number eight indicated that T-Mobile's equipment would cost approximately \$23,000. Break down that total into two costs: antennas and radio equipment.
A1 The response to Council's interrogatory number eight was in error. The cost of T-Mobile's equipment is \$45,000, more specifically:
 - BTS – \$30,000**
 - RF components (antennae and cable) - \$15,000**

2. T-Mobile's response to Council interrogatory number 11 indicated that a second antenna ten feet higher would be required for a flush-mounted configuration. Approximately how many antennas would be located on each level if two levels were required for a flush-mounted configuration?
A2 T-Mobile could utilize a flush mounted antenna design at this proposed facility. This antenna layout design would require an additional antenna location 10 feet higher than T-Mobile's initial design height of 97 feet on the proposed facility. With this antenna layout, there would be 6 antennas total

located at this facility - 3 antennas at each mounting height with 1 antenna per sector.

3. T-Mobile's response to Council interrogatory number 18 indicated that the proposed SBA facility on Cross Lane could provide adequate coverage to T-Mobile's target area. If T-Mobile were to co-locate at the Cross Lane site to provide coverage, at what height would T-Mobile locate its antennas? Provide existing and proposed coverage plots assuming that T-Mobile co-located at the SBA site at that height. Also, include the lengths of proposed coverage to the roads and rail lines that T-Mobile would seek to cover from such site.

A3 In a meeting of the Old Lyme Board of Selectmen held January 25, 2010 the Town rejected the referenced SBA proposal. (See attached correspondence from Town). As a result, the proposed SBA facility is not an option from which T-Mobile could provide any coverage to this area.

4. Under Exhibit/Tab I of T-Mobile's application to the Council, T-Mobile lists all existing telecommunications towers within four miles of the proposed facility. Indicate which of the facilities T-Mobile is already co-located on and which ones T-Mobile is not on but would not provide adequate coverage to the target area.

A4 The existing telecommunications towers within four miles of the proposed facility are as follows:

- a) 2 Ferry Place, Old Saybrook: T-Mobile is currently not on this site. It is located too far to the northwest of the coverage objective for the CTNL803 search area to provide reliable coverage to this area.
- b) 132 Whippoorwill Road, Old Lyme: T-Mobile is currently not on this site. It is located too far to the north of the coverage objective for the CTNL803 search area to provide reliable coverage to this area.
- c) 62-1 Boggy Hill Road, Old Lyme: T-Mobile is currently located on this facility at 172 feet AGL (T-Mobile Site ID# CT11636A).
- d) 38 Hatchetts Hill Road, Old Lyme: T-Mobile is currently located on this facility at 185 feet AGL (T-Mobile Site ID# CT11038C).
- e) 30 Short Hills Road, Old Lyme: T-Mobile is currently not on this site. It is located too far to the north of the coverage

objective for the CTNL803 search area to provide reliable coverage to this area.

d) 125 Mile Creek Road, Old Lyme: T-Mobile is currently located on this facility at 168 feet AGL (T-Mobile Site ID# CTNL802A).

5. Under Exhibit/Tab Q of the application, EBI Consulting indicated that four attempts were made to contact the Narragansett Tribe. What was the outcome of the consultation with the Narragansett Tribe regarding the proposed facility?

A5 Attached please find a copy of the Narragansett Indian Tribal Historic Preservation Office Consultation Response Form indicating the proposed wireless facility is in compliance with and cleared from historic concerns.

Respectfully submitted,

T-MOBILE NORTHEAST, LLC

By: 

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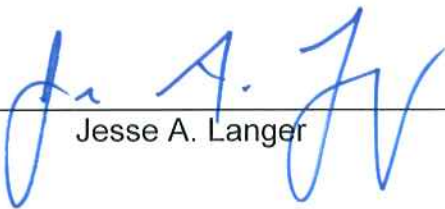
CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by regular mail, postage prepaid, to all parties and interveners of record, as follows:

Christopher B. Fisher, Esq.
Daniel M. Laub, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601

Kenneth C. Baldwin, Esq.
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280 Trumbull Street
Hartford, CT 06103-3597

The Honorable Timothy C. Griswold
First Selectman
Town of Old Lyme
Town Office Building
52 Lyme Street
Old Lyme, CT 06371



Jesse A. Langer

ATTACHMENT A

Langer, Jesse A.

From: Marilyn Clarke [mcclarke5441@sbcglobal.net]
Sent: Wednesday, January 27, 2010 3:45 PM
To: Langer, Jesse A.
Subject: T-Mobile Northeast
Attachments: T-Mobile ltr to Atty Langer.doc

Please see attached.

Marilyn C. Clarke
P.O. Box 334
10 Lyme Street
Old Lyme , CT 06371
(860) 434-1685
(860) 434-7886 Fax

January 27, 2010

Jesse A. Langer, Esq.
Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604

RE: T-Mobile Northeast
Connecticut Siting Council Docket #391, #392 and #393

Dear Attorney Langer:

I am in receipt of a copy of T-Mobile Northeast, LLC's Interrogatories to the Town of Old Lyme in reference to the above Siting Council docket numbers.

This is to formally advise you that at the Annual Town Business Meeting on January 25, 2010, the motion to approve the lease of land at the 14 Cross Lane firehouse site to SBA Towers II, LLC for a telecommunications facility was defeated.

Therefore there is no need for the Town to respond to T-Mobile Northeast's Interrogatories regarding the Cross Lane site.

Very truly yours,

Marylin C. Clarke

MCC:sk

ATTACHMENT B

Narragansett Indian Tribal Historic Preservation Office
Section 106 Review
Consultation Response Form

TCNS Notification ID Number:	46866
EBI Project Number:	61087294
Address or Location Description:	232 Shore Road
City, State:	Old Lyme, MA
Point of Contact/Initial Submission	Brian Hooper

Response:

- We have no comments related to the proposed project.
- NITHPO's site examination revealed no indicators of the presence of past tribal cultural resources. On behalf of the Narragansett Indian Tribe, the NITHPO considers this project in compliance with and cleared of the Narragansett Tribe's section 106 concerns. NITHPO anticipates no inadvertent encounters by you or your client with significant intact cultural resources (burials, village sites or ceremonial sites).
- Based on information provided to us the site is not to include any ground disturbance and is therefore found to be in compliance with and cleared of the Narragansett Tribe's section 106 concerns.
- NITHPO's site examination revealed probable indicators of the presence of past tribal cultural resources, and recommends the following actions:

Exception: *If archaeological materials or human remains are encountered during construction, the Narragansett Indian Tribal Historic Preservation Office and applicable Historic Preservation Office(s) will be notified.*

Sequahna Mars
Sequahna Mars, Project Manager, NITHPO

6/19/09
Date

Narragansett Indian Tribal Historic Preservation Office
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Wyoming, RI 02898
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Phone: 401-419-2959 Fax: 401-491-9044