

**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

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RE: APPLICATION BY T-MOBILE  
NORTHEAST, LLC FOR A  
CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED  
FOR A TELECOMMUNICATIONS FACILITY  
AT 387 SHORE ROAD IN THE TOWN  
OF OLD LYME, CONNECTICUT

DOCKET NO. 392

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RE: APPLICATION BY T-MOBILE  
NORTHEAST, LLC FOR A  
CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED  
FOR A TELECOMMUNICATIONS FACILITY  
AT 61-1 BUTTONBALL ROAD IN THE TOWN  
OF OLD LYME, CONNECTICUT

DOCKET NO. 393

Date: January 28, 2010

**INTERROGATORY RESPONSES TO TOWN OF OLD LYME  
FROM APPLICANT T-MOBILE NORTHEAST, LLC**

The Applicant, T-Mobile Northeast, LLC ("T-Mobile"), submits the following responses to the first set of Pre-Hearing Interrogatories propounded by the Town of Old Lyme in connection with the above-captioned Application.

1. Using the same coverage thresholds as those used in the propagation maps included in the applications for docket 391, 392 and 393, please produce the following propagation maps at a sufficient scale to show the coverage areas for all three of the sites proposed in dockets 391, 392 and 393:
  - a) T-Mobile's existing coverage.
  - b) T-Mobile's existing coverage plus the proposed coverage for the site proposed in docket 391.
  - c) T-Mobile's existing coverage plus the proposed coverage for the site proposed in docket 392.
  - d) T-Mobile's existing coverage plus the proposed coverage for the site proposed in docket 393.
  - e) T-Mobile's existing coverage plus the proposed coverage for the sites proposed in docket 391, 392 and 393.

**A1 Responsive propagation plots are attached hereto.**

2. Please produce a propagation map, in the same scale used in response to interrogatory #1, showing:
  - a) T-Mobile's existing coverage plus proposed coverage from the site proposed on property owned by the Town of Old Lane at 14 Cross Lane (the "Town Site") at an antenna centerline at 157'.
  - b) T-Mobile's existing coverage plus proposed coverage from the Town Site at an antenna centerline at 147'.
  - c) T-Mobile's existing coverage plus proposed coverage from the Town Site at an antenna centerline at 137'.

**A2 As the Town Site was rejected by a public vote held on January 25, 2010, the Town has agreed that interrogatories regarding the Town Site no longer require a response.**

3. Please quantify the total coverage footprint, in square feet, of the following:
  - a) T-Mobile's proposed coverage from the site proposed in docket 391.

**1.50 square miles / 41,817,600 square feet**

b) T-Mobile's proposed coverage from the site proposed in docket 392.

**0.96 square miles / 26,763,264**

c) T-Mobile's proposed coverage from the site proposed in docket 393.

**3.54 square miles / 98,689,536**

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d) T-Mobile's proposed coverage from the Town Site at an antenna centerline of 157'.

**See response to interrogatory 2 above.**

e) T-Mobile's proposed coverage from the Town Site at an antenna centerline of 147'.

**See response to interrogatory 2 above.**

f) T-Mobile's proposed coverage from the Town Site at an antenna centerline of 137'.

**See response to interrogatory 2 above.**

4. In regards to the site proposed in Docket 392, please comment on the viability of other licensed wireless carriers utilizing the proposed facility for tower sharing, since the tower is proposed at only 80 feet and the equipment compound is proposed at only 20 feet by 40 feet.

**A4 T-Mobile can not comment as to whether this site is a viable option for other carriers to utilize from a coverage stand point. Each carrier has its own coverage gaps and solutions based upon their existing on-air coverage footprints, frequency constraints and design criteria. T-Mobile is not in a position to comment on the state of other wireless carriers networks or their current search areas.**

**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, 14<sup>th</sup> Floor  
White Plains, NY 10601

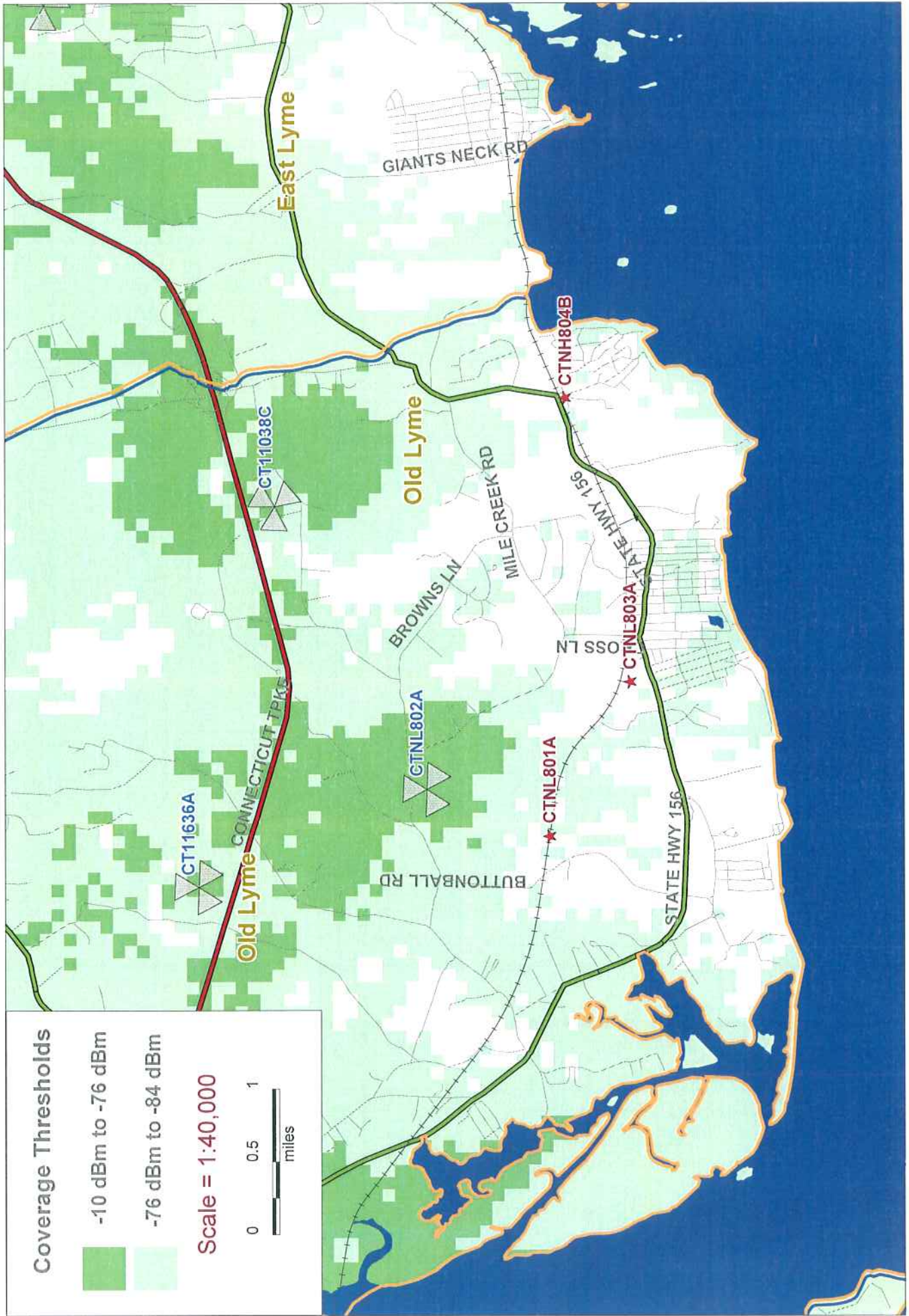
Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103-3597

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**



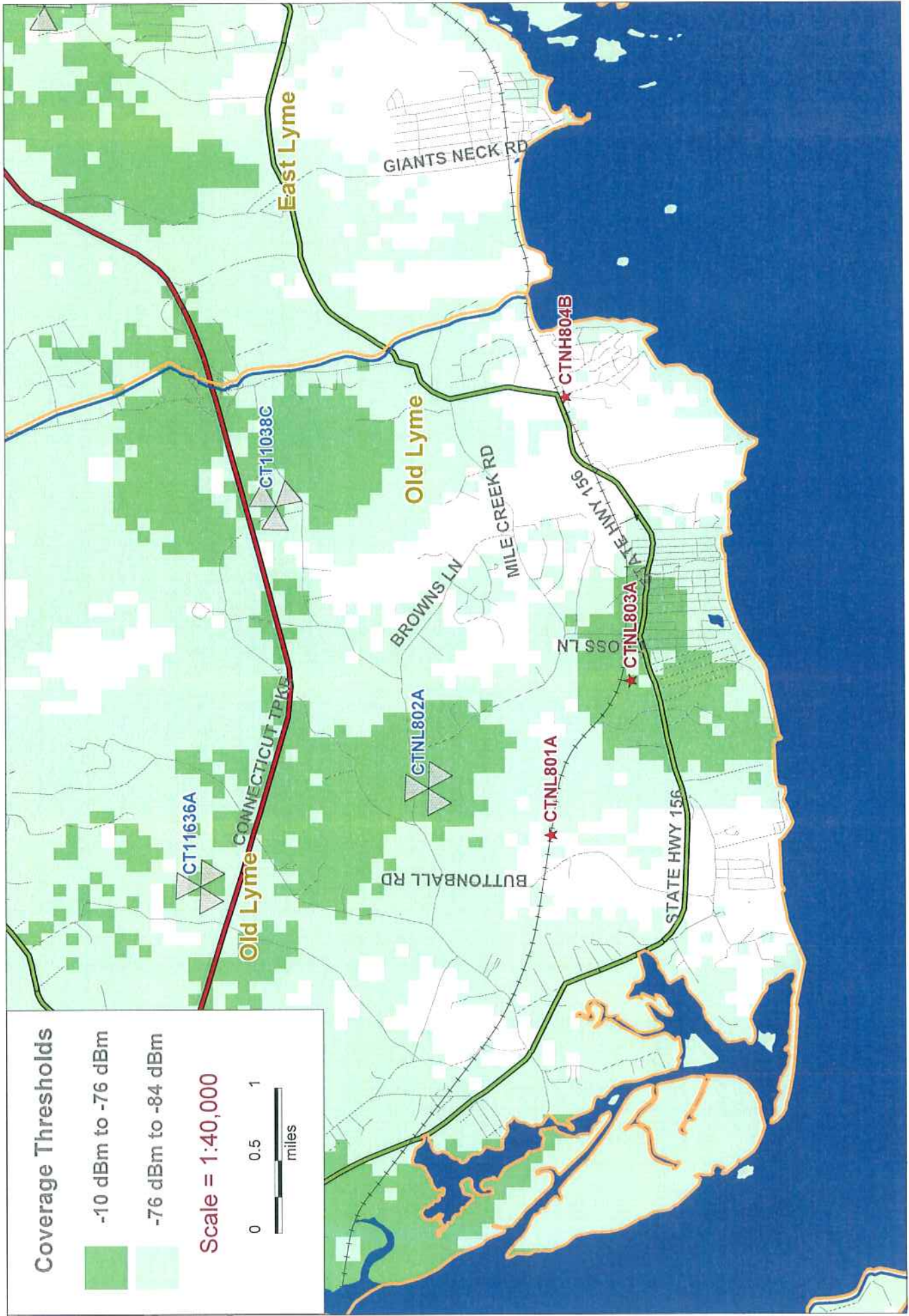
Coverage Thresholds  
 Dark Green - In Building Coverage  
 Light Green - In Vehicle Coverage

- T-Mobile-- Existing T-Mobile On Air Coverage

- T-Mobile--







**Coverage Thresholds**

-10 dBm to -76 dBm

-76 dBm to -84 dBm

Scale = 1:40,000



Coverage Thresholds  
 Dark Green - In Building Coverage  
 Light Green - In Vehicle Coverage

Existing T-Mobile On Air Coverage  
 With CTNL803A @ 100'

- **T-Mobile** -



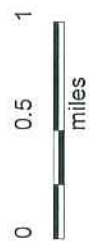




Coverage Thresholds

- 10 dBm to -76 dBm
- 76 dBm to -84 dBm

Scale = 1:40,000



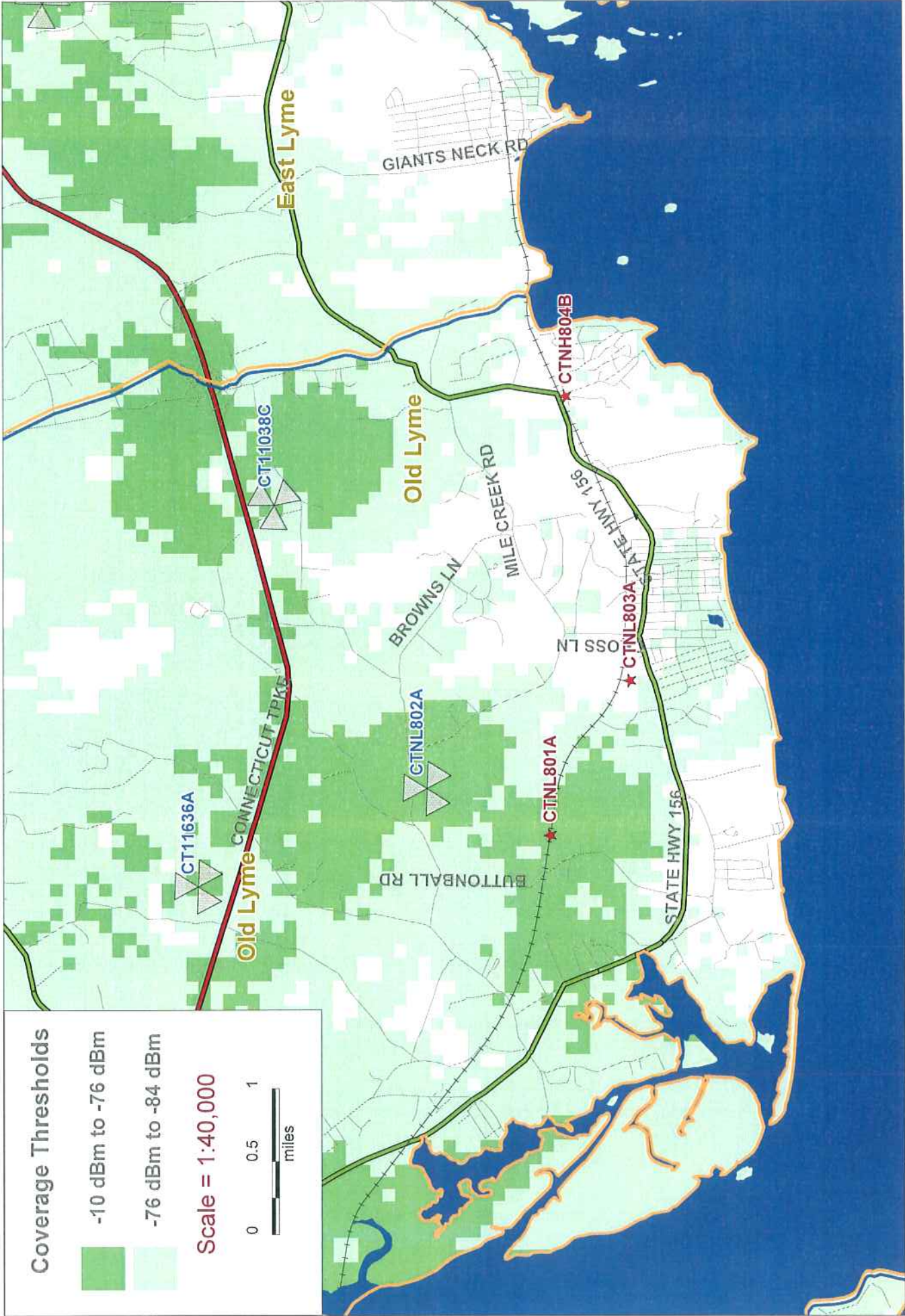
Coverage Thresholds  
 Dark Green - In Building Coverage  
 Light Green - In Vehicle Coverage

Existing T-Mobile On Air Coverage  
 With CTNL804B @ 77'

- **T-Mobile** -



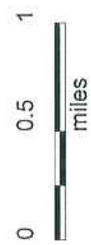




Coverage Thresholds

- 10 dBm to -76 dBm
- 76 dBm to -84 dBm

Scale = 1:40,000



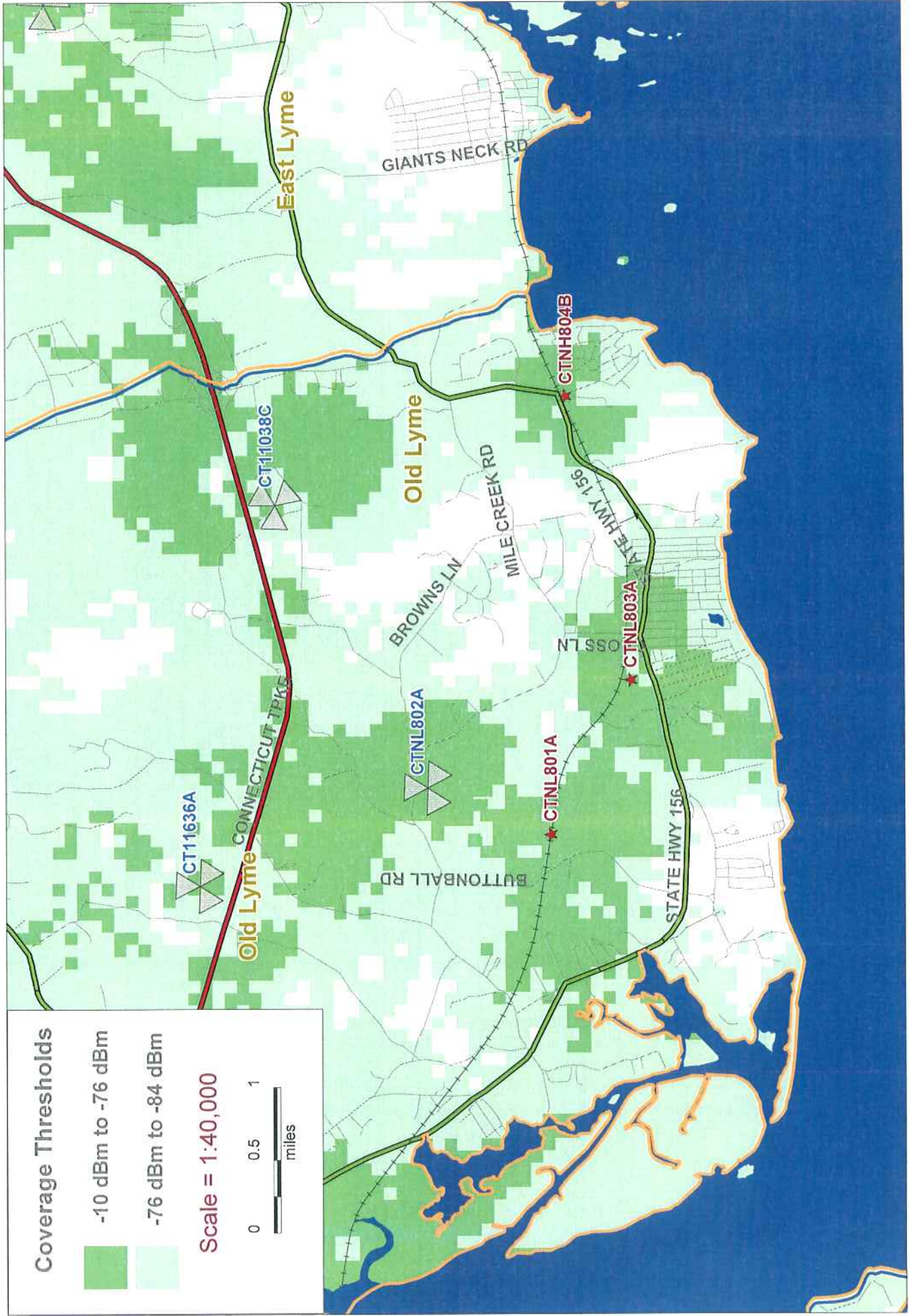
Coverage Thresholds  
 Dark Green - In Building Coverage  
 Light Green - In Vehicle Coverage

Existing T-Mobile On Air Coverage  
 With CTNL801A @ 97'

- **T-Mobile** -







**Coverage Thresholds**

-10 dBm to -76 dBm

-76 dBm to -84 dBm

Scale = 1:40,000



**- T-Mobile -**  
 Existing T-Mobile On Air Coverage  
 With CTNL801A @ 97', CTNL803A @ 100'  
 and CTNL804B @ 77'

Coverage Thresholds  
 Dark Green - In Building Coverage  
 Light Green - In Vehicle Coverage

