

445 Hamilton Avenue, 14th Floor White Plains, New York 10601 1ct 914.761.300 Fax 914.761.5372 www.cuddyladet.com

June 28, 2010

VIA EMAIL & OVERNIGHT DELIVERY

Hon. Daniel F. Caruso, Chairman and Members of the Connecticut Siting Council 10 Franklin Square New Britain, CT 06051

Re:

Docket 391

Certificate Application of T-Mobile Northeast, LLC

232 Shore Drive, Old Lyme, Connecticut

Dear Chairman Caruso and Members of the Siting Council:

On behalf of AT&T, and as requested by the Siting Council at the June 23, 2010 hearing on the captioned Docket, we respectfully enclose an original and twenty copies of AT&T's analysis of tower locations in Dockets 392 and 393 including demonstrative coverage plots.

Should the Council or staff have any questions, please do not hesitate to contact me.

Very truly yours,

Daniel M. Laub

Enclosures

cc:

Parties and Intervenors Michele Briggs, AT&T John Blevins, AT&T David Vivian, SAI

Christopher B. Fisher, Esq.

C&F: 1391948.1

CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and twenty copies of AT&T's Analysis of Tower Locations in Dockets 392 and 393 were served on the Connecticut Siting Council by electronic mail and overnight delivery as well as delivery to the following:

T-Mobile Northeast LLC
Julie D. Kohler, Esq.
Monte E. Frank, Esq.
Jesse A. Langer, Esq.
Cohen & Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604
jkohler@cohenandwolf.com
mfrank@cohenandwolf.com
jlanger@cohenandwolf.com

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

Hon. Timothy C. Griswold First Selectman Town of Old Lyme 52 Lyme Street Old Lyme, CT 06371 firstselectman@oldlyme-ct.gov

Daniel M. Laub

Dated: June 28, 2010

C&F: 1391948.1

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 DRIVE IN

OLD LYME, CONNECTICUT

June 28, 2010

INTERVENOR NEW CINGULAR WIRELESS ("AT&T") ANALYSIS OF TOWER LOCATIONS IN DOCKETS 392 AND 393

AT&T reviewed the tower locations proposed by T-Mobile in Dockets 391, 392 and 393 to identify sites that would serve its needs for coverage and subsequently intervened in Docket 391. AT&T conducted additional analysis of the two sites proposed in Dockets 392 and 393 and provides the following analysis regarding the ability of those sites to satisfy AT&T's identified need in the Town of Old Lyme:

- 1. 387 Shore Road/Docket 392: A tower located at 387 Shore Road would provide incremental improvement in conjunction with the proposed site at 232 Shore Road. 387 Shore Road would not replace 232 Shore Road even at 195' AGL due to its distance to the desired service area as per the attached coverage map ("Current Coverage plus 387 Old Shore Road @ 195'"). Even together with a second tower at 61-1 Old Buttonball Road, a 387 Shore Road site will not provide all of the coverage that the proposed facility at 232 Shore Road can provide (see "Current Coverage Plus Alternate Sites").
- 2. 61-1 Old Buttonball Road/Docket 393: This location is too close to an existing AT&T site at 125 Mile Creek Road (AT&T Site CT2235) and coverage from this location would mostly be redundant with that existing site. Even in conjunction with a site at 387 Shore Road (both at 175' AGL) it will not provide comparable coverage to the proposed facility at 232 Shore Road as demonstrated on the attached coverage map marked Current Coverage Plus Alternate Sites.



