# 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

WIRELESS TELECOMMUNICATIONS FACILITY AT 232 SHORE ROAD, OLD

LYME, CONNECTICUT : APRIL 26, 2010

# RESPONSE OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS TO CONNECTICUT SITING COUNCIL QUESTIONS REGARDING ALTERNATIVE TOWER LOCATIONS

During the course of its April 20, 2010 hearing on Docket No. 391, the Council asked intervenors Cellco Partnership d/b/a Verizon Wireless ("Cellco") and AT&T Wireless for certain additional information regarding the need for one or more of the tower sites proposed by T-Mobile Northeast, LLC ("T-Mobile") in Docket Nos. 391, 392 or 393 and any future network development plans in the Town of Old Lyme. Cellco's response to these questions are provided below.

#### Question No. 1

Could Cellco satisfy its coverage objectives in the southerly portion of Old Lyme from a tower located at 387 Shore Road, the subject site in T-Mobile Docket No. 392? If so, what antenna height would Cellco require at this location.

#### Response

As stated in its responses to Council interrogatories, Cellco currently experiences gaps in

its wireless service along Route 156 and portions of the Amtrak rail line, as well as local roads and a number of summer residential communities in the southeast portion of Old Lyme. (See Cellco's Interrogatory Response Nos. 4, 8, 9 and 11).

Cellco has intervened in the T-Mobile Docket No. 391 application and intends to share the tower proposed at 232 Shore Road at an antenna centerline height of 90 feet above ground level ("AGL"). Cellco could also satisfy its coverage objectives in Old Lyme from the tower proposed at 387 Shore Road (Docket No. 392), provided it could mount its antennas at a minimum centerline height of 140 feet AGL.

#### Question No. 2

Does Cellco have any plans, in the foreseeable future, for the development of additional cell sites in Old Lyme, which facilities may interact with one or more of the sites proposed by T-Mobile in Docket Nos. 391, 392 or 393? Would the location of these potential new facilities be impacted, in any way, by the development of one or more of the T-Mobile towers proposed in Docket Nos. 391, 392 or 393?

### Response

Cellco has no plans to develop any additional cell sites in Old Lyme in the foreseeable future, other than the site proposed by T-Mobile at 232 Shore Road. Cellco's two existing facilities that provide service in the southerly portion of Old Lyme today, cannot satisfy its coverage objectives along Route 156, the Amtrak rail line, local roads and residential communities in southeast Old Lyme. Likewise, any future cell sites, designed to cover areas to the north, would not be able to satisfy Cellco's objectives in southeast Old Lyme.

## **CERTIFICATE OF SERVICE**

I hereby certify that on the 26<sup>th</sup> day of April, 2010, a copy of the foregoing was sent, postage prepaid, to:

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