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 8, 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 first set of Pre-Hearing Interrogatories propounded by the Connecticut Siting Council in connection with the above-captioned Application.

- 1. What is T-Mobile Northeast, LLC's (T-Mobile) existing signal strength in the area that would be covered by the proposed facility?
- A1 T-Mobile's existing coverage in the area that would be covered by the proposed Facility ranges from -84 down to values below -110 dBm. The majority of the area is well below T-Mobile's minimum design threshold of -84 dBm.
- 2. What is the minimum signal level T-Mobile would consider acceptable for service in the vicinity of the proposed site?
- A2 T-Mobile's minimum allowable signal strength is -84 dBm.
- 3. What is the minimum signal level that T-Mobile requires in order to provide adequate in-vehicle coverage? What is the minimum signal level that T-Mobile requires in order to provide adequate in-building coverage?
- A3 T-Mobile's minimum design threshold for reliable in-vehicle coverage is -84 dBm. T-Mobile's minimum design threshold for reliable in-building coverage is -76 dBm.

- 4. When was the search ring first initiated for a tower in this area? What is the size and shape of the search ring? Where is the center of the search ring?
- A4 T-Mobile initiated a search area in this section of Old Lyme on or about July 17, 2008. The search area focused on a .2 mile radius with the center located at the intersection of Cross Lane and the Amtrak Rail Line.
- 5. What were the results of T-Mobile's notice to abutting property owners? Were the certificates of service returned from all those to whom notice was sent? If not, whose certificate was not returned? What other attempts were made to notify these persons? Provide a copy of all returned certificates of service.
- A5 T-Mobile has received all but two of the return receipts for the abutting landowners listed in the Application. Those that remain outstanding include the following: (1) Capital Holding of CT, Inc., of 230 Shore Road and (2) Michele M. Johnson of 1 Hawks Nest Road. On October 29, 2009, T-Mobile issued a second notice to these abutters and both were returned as unable to forward. Copies of all returned receipts are appended hereto as Attachment A.
- 6. Describe the land uses surrounding the proposed tower site.
- A6 The area to the north consist of the Amtrak right-of-way. The areas to the south include commercial (office) uses. The areas to the east include commercial/warehouse and residential uses. The areas to the west consist of vacant land.
- 7. Has T-Mobile considered alternative technologies such as repeaters and/or microcells to serve the proposed coverage area? Were either found to be viable alternatives to a proposed tower?
- A7 T-Mobile has considered alternate design solutions such as repeaters and micro-cells. Repeaters are ineffective in this area because of a lack of usable reliable signal in the design area that could be repeated. Second, for a repeater site to be effective it needs to be able to broadcast the repeated signal over the intended coverage objective. This would require it to overcome the same terrain obstructions as the proposed facility. Repeaters are better suited to extend an existing reliable footprint over specific terrain features such as a ridge line or a bend in a roadway where it is typically not economically practical to build a new macro-footprint site for the limited area or limited customer base in the intended area. This also requires existing structures to be available to mount the repeater antennas on to extend the footprint. In this design scenario, T-Mobile is looking to

create a new coverage footprint to a fairly significant area and the use of repeaters would not be an effective solution to this scenario.

Micro-cells would also not be a viable solution here due to the fact that T-Mobile is trying to provide initial footprint coverage to a fairly significant area. Micro-cells are better suited for very specific coverage areas such as a city block or a stretch of roadway where a small coverage gap exists or traffic needs to be off-loaded from the larger macro-cells that currently serve the area.

- 8. Does the total construction costs include antennas and radio equipment? Provide the estimated costs of the antennas and the estimated costs of the radio equipment.
- A8 No, the construction costs do not include T-Mobile's equipment. T-Mobile's equipment would cost approximately \$23,000.
- 9. Provide the distance and direction from the proposed site to the existing (or proposed) sites that the proposed tower would interact with. Also include the addresses, tower heights, antenna heights and tower types (e.g. monopole).
- A9 A list of surrounding sites that the proposed site will interact with is appended hereto as Attachment B.
- 10. Are the standoff cross-arm antenna mounts essentially the same or similar to T-arm mounts? Explain.
- A10 Yes, stand-off cross-arms and T-arm mounts are the same. The mounts consist of an approximate 4" x 4" tube steel arm perpendicular to the tower face with a 10' to 12' horizontal mounting pipe at its end upon which the antenna masts and antennas are mounted.
- 11 Would flush-mounted antennas provide the required coverage? Would such configuration result in reduced coverage and/or necessitate greater antenna height? Explain.
- A11 Utilizing flush mounted antennas would still allow T-Mobile to provide the required coverage footprint from the proposed site. This design, however, would require T-Mobile to mount a second antenna 10 feet higher on the tower for its UMTS deployment.

- 12. Would T-Mobile only provide PCS service? Explain.
- A12 T-Mobile would provide GSM and UMTS service to the objective area. In Connecticut T-Mobile has been granted licenses in the PCS frequency band to provide GSM services as well as licenses in the AWS frequency band to provide UMTS services.
- Are the proposed coverage plots included in T-Mobile's Application based on an antenna centerline height of 97 feet above ground level (agl)? The tower elevation drawing depicts the antennas centered at 100 feet agl. Would this possible three-foot discrepancy have a material effect on the coverage results? If yes, provide updated coverage plots based on the correct antenna height.
- A13 The three foot difference between the tower drawings and the proposed coverage plots supplied in the application would not result in a material change in anticipated coverage.
- 14. Provide coverage plots using the same scale provided assuming the tower is ten feet shorter than proposed and twenty feet shorter than proposed, respectively.
- A14 Responsive coverage plots are appended hereto as Attachment C.
- 15. Provide the individual lengths of the coverage gaps (in miles) for the roads that T-Mobile seeks to provide coverage to. Describe criteria and parameters in determining the lengths of the road.
- A15 In the immediate area of the proposed CTNL803A Site, T-Mobile currently has gaps in service along the listed roadways and rail lines with given distances. The criteria for determining the gap is the area where the existing coverage footprint falls below the minimum design threshold for T-Mobile of -84 dBm.

a) State Highway 156: 3.36 miles b) Mile Creek Road: 1.15 miles c) Cross Lane: 0.35 miles

d) Amtrak Rail line 4.62 miles along the shoreline in Old

Lyme/East Lyme

- 16. Provide the individual lengths of coverage (in miles) that would be provided by the proposed facility on the roads that T-Mobile seeks to provide coverage to. Provide similar data assuming the tower is ten feet shorter and twenty feet shorter, respectively.
- A16 Distances covered along the roadways and rail lines listed in # 15 at antenna heights of 100', 90' and 80'

Antenna Height of 100'

a) State Highway 156: 1.58 miles b) Mile Creek Road: 0.39 miles c) Cross Lane: 0.37 miles d) Amtrak Rail line 1.44 miles

Antenna Height of 90'

a) State Highway 156: 1.45 miles b) Mile Creek Road: 0.22 miles c) Cross Lane: 0.37 miles d) Amtrak Rail line 1.22 miles

Antenna Height of 80'

a) State Highway 156: 1.38 miles b) Mile Creek Road: 0.12 miles c) Cross Lane: 0.37 miles d) Amtrak Rail line 1.02 miles

- 17. Provide the areas (in square miles) that would be covered by this facility assuming that the tower is the proposed height, ten feet shorter, and twenty feet shorter, respectively.
- A17 Square mileage of coverage from the proposed Facility at 100', 90' and 80'

100 feet: 1.503 square miles 90 feet: 1.292 square miles 80 feet: 1.103 square miles

18. Is T-Mobile familiar with the proposed SBA Towers II LLC facility at 14 Cross Lane, Old Lyme? If T-Mobile co-located at this facility, could it provide adequate coverage to the target area that T-Mobile seeks to cover via the 232 Shore Road tower site? Explain.

- A18 T-Mobile is familiar with the SBA proposed facility on Cross Lane. This site would provide satisfactory coverage to T-Mobile's targeted CTNL803 coverage objective.
- Calculate the amounts of cut and fill required to develop the proposed tower site and access drive.
- A19 The proposed Facility would require 8 cubic yards of cut and 42 cubic yards of fill for the compound, as well as 222 cubic yards of cut and 222 cubic yards of fill for the trench.
- 20. Would the proposed chain-link fence surrounding the compound have barbed wire?
- A20 T-Mobile has proposed to install anti-climb weave fencing mesh. If required by the Council, T-Mobile could install a standard chain-link fence with barbed wire.
- 21. Would T-Mobile have backup power at its tower site? How would backup power be provided, e.g. battery, diesel generator, etc.? Has T-Mobile considered using a fuel cell as a backup power source for the proposed facility? Explain.
- A21 T-Mobile will utilize a self-contained 48 VDC Self Back-Up Power System with sealed batteries rated at an approximate 4 to 12 hour duration. T-Mobile does not plan to use a fuel cell at the proposed Facility. T-Mobile does not have any current plans to install fuel cells at any of its existing or future sites in Connecticut.

Respectfully submitted,

T-MOBILE NORTHEAST, LLC

By:

Julie D. Kohler, Esq.

Jesse A. Langer, Esq.

Cohen and Wolf, P.C.

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Bridgeport, CT 06604

Tel. (203) 368-0211

Fax (203) 394-9901

jkohler@cohenandwolf.com

jlanger@cohenandwolf.com

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. Robinson & Cole LLP 280 Trumbull Street Hartford, CT 06103-3597

Julie D. Kohler

ATTACHMENT A



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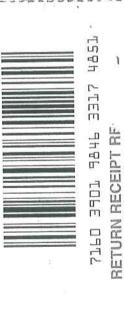
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ATTACHMENT B

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Site ID	Address	Town	Structure Type	Structure Height	Height	CTNL803	CTNH803
CTNL802A	125 Mile Creek Road	Old Lyme	Monopole	170 feet	170 feet	1.18 miles	northwest
CT11636A	72 Boggy Hole Road	Old Lyme	Monopole	175 feet	175 feet	2.41 miles	northwest
CT11038C	38 Hatchers Hill Road	Old Lyme	Monopole	190 feet	187 feet	2.01 miles	northeast
CT11037B	93 Roxbury Road	Old Lyme	Self Support Tower	160 feet	103 feet	4.51 miles	northeast
CT11036C	8 Old Bridge Road	Old Lyme	Utility Pole	175 feet	181 feet	3.63 miles	northwest
CT11327A	44 Ford Drive	Old Savbrook	Monopole	150 feet	150 feet	4.62 miles	northwest

ATTACHMENT C



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

-T-Mobile-- Existing T-M

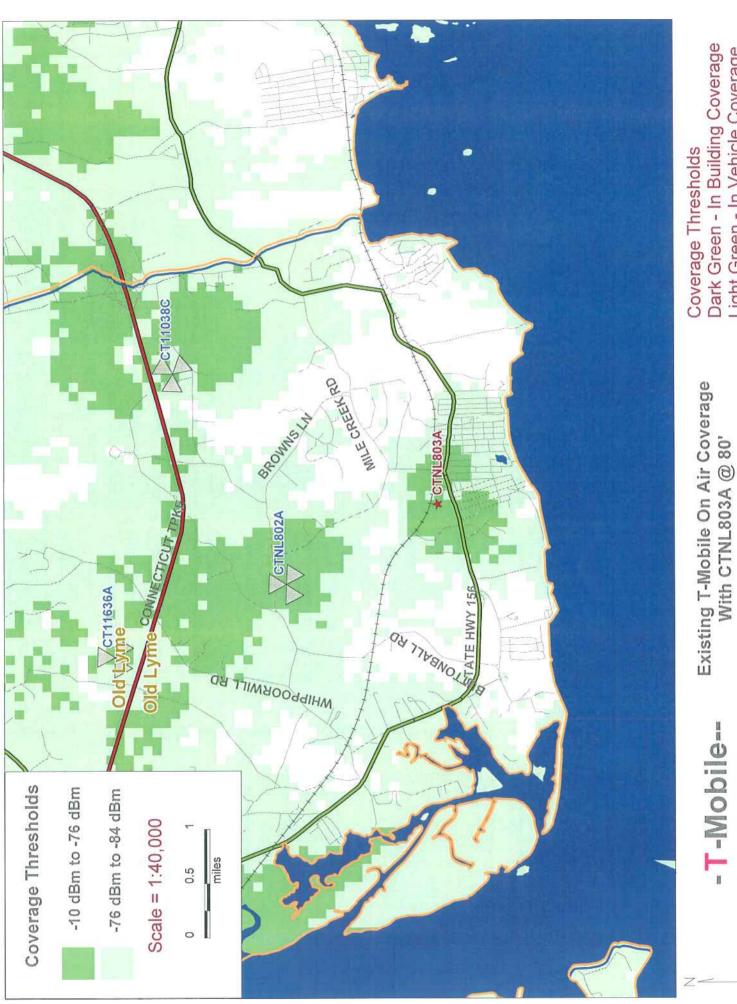
Existing T-Mobile On Air Coverage



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

■ T-Mobile Proposed CTNL803A @ 80'

-T-Mobile--



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

-T-Mobile--



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

T-Mobile Proposed CTNL803A @ 90'



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

-T-Mobile--

Existing T-Mobile On Air Coverage With CTNL803A @ 90'



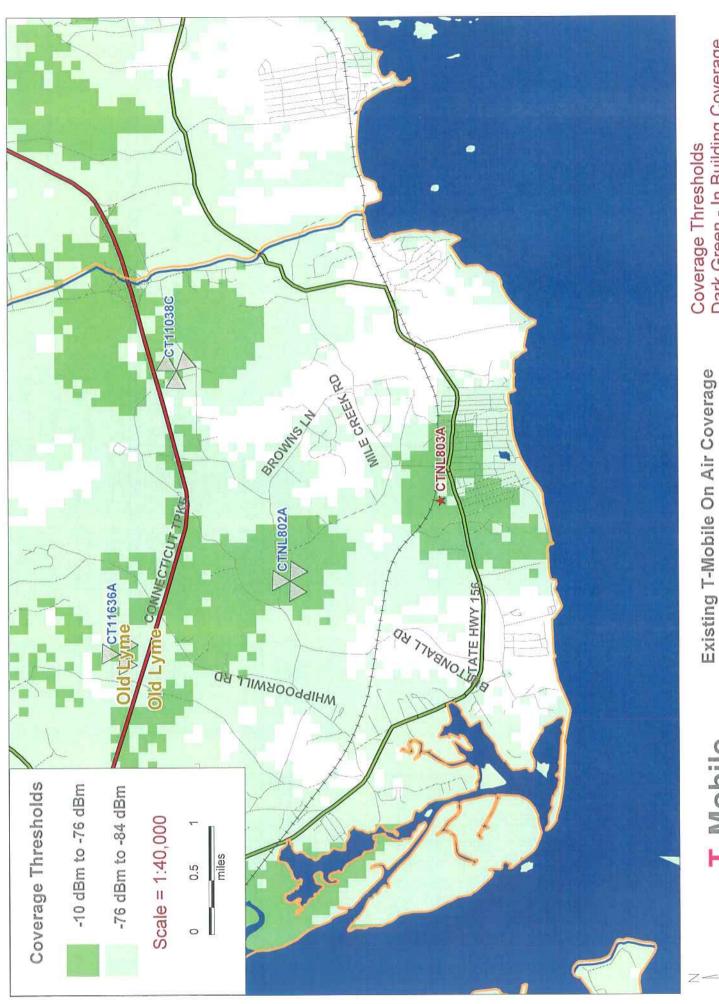
Coverage Thresholds

Output Green - In Building Coverage

Light Green - In Vehicle Coverage

- T-Mobile-- T-Mobile Pro

T-Mobile Proposed CTNL803A @ 100'



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

-T-Mobile--

VII C=- EXISTING 1-MODIIE ON AIR COV