

STATE OF CONNECTICUT
SITING COUNCIL

IN RE: T-MOBILE NORTHEAST, LLC : DOCKET #393
APPLICATION FOR CERTIFICATE FOR :
TELECOMMUNICATIONS FACILITY AT :
BUTTONBALL ROAD, OLD LYME : March 18, 2010.

BLACK HALL GOLF CLUB'S INTERROGATORIES TO APPLICANT

The following Interrogatories are propounded to the Applicant in accordance with the Council schedule dated March 10, 2010. When referring to T-Mobile or the Applicant or "you", the interrogatories are referring to T-Mobile Northeast, LLC or any of its affiliates or corporate parents or subsidiaries and Intervening wireless carriers and their subsidiaries or corporate parents.

1. Have you or your corporate predecessors or affiliates installed a micro-cell wireless communications facility in New York or New England?
2. If so, how many times and in what locations?
3. How many times have you successfully installed a micro-cell wireless communications facilities outside of Connecticut?
4. Please name all carriers with whom you have reason to believe will co-locate on the proposed facility.
5. Did you consider locating at the site located off Buttonball Road, owned by the Black Hall Club known as the quarry site which was the subject of CSC Docket 202? If that site were made available to T-Mobile, would it provide reliable coverage to the target area? If so, explain why this site cannot provide adequate coverage to the target area with less visual impact.

6. Please provide coverage and visual impact maps (existing, proposed and combined) for the location identified above in Int #6. For the coverage maps please use the same coverage modeling program with the same inputs (other than those that are site specific), power assumptions, antenna configuration, loss ratios and scale as the proposed site and present the results on a clear plastic overlay for comparison purposes.
7. Can you provide coverage propagation maps and isolated propagation maps for the proposed facility on clear plastic overlays using a scale that matches that of the Application?
8. Please identify the size of the search ring and explain why that radius was chosen.
9. What is the percent of dropped calls in the target area?
10. Are you aware of the build out notification required of spectrum license holders filed with the FCC by any of the potential tenants on the proposed tower for the Basic Trading Area which includes Old Lyme? Can you provide a copy of your 5 and 10 year build out notifications and any technical justification and/or coverage maps filed in conjunction therewith?
11. Have you performed drive tests to determine the need for coverage? If so, what methods were used and what data was gathered from the drive test?
12. Since the Council must balance the public need with the impact to natural resources including scenic vistas, in what way have you determined the public need for this particular facility?
13. Specifically what data do you have evidencing this public need?
14. How many residential wireless customers will this facility serve?
15. Please produce any data or engineering reports which proves that the tower and its "fail points" as designed will collapse into itself and not the neighbor's property?

16. If the tower were to fail, what is the probability that it will impact the rail line or the adjacent warehouse structure?
17. What surety do you propose to do to ensure the proper decommissioning of the facility once it is no longer needed or in use?
18. Will you provide a bond to ensure decommissioning?
19. What percentage of the proposed screening trees for the facility will be guaranteed to survive five years?
20. Please describe the methods used by your visual impact consultant to calculate seasonal visibility.
21. How many audible decibels will the associated equipment produce at the nearest points of the property line for the proposed Brainerd Road site?
22. Do you have any data on the expected frequency of power outages requiring use of a backup ?
23. What computer software (name, producer, version) did you use in confirming the allegedly significant gap in coverage surrounding the site?
24. Is this software available for inspection so that others may make independent confirmation of its accuracy?
25. In generating the proposed coverage maps, what average tree height and leaf coverage was assumed in the model?
26. How was the height of 97 feet determined for the tower?
27. How are "repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies" not feasible in the proposed area of Old Lyme ?
28. Why are such technologies not feasible?
29. What studies did you undertake to eliminate alternate technologies from consideration given that they are of lesser impact to surrounding property uses?
30. Who conducted the feasibility studies on alternate technologies?

31. Please provide the feasibility studies or data by which you determined the lack of feasibility?
32. Have you considered using a combination of DAS or leaky coax along the rail lines in conjunction with a shorter tower to cover the target area?
33. In the proposed coverage maps submitted by the Applicant, what loss margin was assumed in the modeling?
34. For any signal strength predicted by your coverage modeling, what percent-of-locations is assumed for reliability? (e.g: 85% of locations, 95%?)
35. Are you assuming that your target coverage is 'reliable service' or "adequate coverage"? Do these two terms differ? How do you define these two terms for the purposes of meeting the goals of the Telecommunications Act of 1996?
36. What number of residential homes are located on the road where the tower is proposed?
37. Do you have or have you conducted any studies regarding the impact of real estate property values by nearby cell towers?
38. Have you performed an analysis of the likely impact on real property values of the residences in the immediate vicinity of the proposed facility on Brainerd Road?
39. When was the real estate value analysis conducted?
40. By whom was the real estate value analysis conducted?
41. Will you provide a copy of the real property value analysis performed by the Applicant?
42. Has the Applicant explored either as a matter of general business policy or as a matter of formal planning with the Siting Council, the use of less-intrusive technologies for the provision of service in residential areas?
43. What was the result of any such planning identified in the previous

interrogatory?

44. The Application targets coverage for mobile traffic on Route 156 and the Amtrak corridor. What data do you have indicating customer complaints or demands for service in these areas?
45. How many residences (as opposed to acres) will have year round views of the proposed towers? Seasonal views?
46. **How many wireless customers of the Applicant have residences in the proposed coverage area?** How many of those have complained about inadequate technical service (as opposed to customer service, billing questions, etc.)?
47. What is the percentage of dropped calls and ineffective attempts, as compared to the remainder of the Market Trading Area in Old Lyme?
48. What is the lowest height you can construct a tower to improve coverage?
49. Please identify all properties listed on the National Register of Historic places within the viewshed of the proposed tower?
50. Has the Applicant determined whether the area of the proposed facility is served by fiber optic cable?
51. Please identify how many other future sites will be necessary, at a minimum to accomplish adequate coverage for Old Lyme.
52. Will changes in traffic usage necessitate heightening the tower beyond the proposed height?
53. Will any blasting be necessary to complete construction of the facility? If so, what notice and in what form will be given to nearby property owners?
54. Recognizing that the Council takes into account whether the proposed tower meets local regulatory standards, will the construction of the proposed tower conform to all local zoning ordinances and regulations? If not, which zoning ordinances will not be complied with and how?
55. What is the minimum dBm signal strength to accomplish hand off of a call to the

nearest adjacent cell for 700Mhz, 850 MHz and 1900 Mhz?

56. If the tower is located at the proposed site, are you willing to reduce the tower height to 87ft, utilize a monopine configuration, add cedar screen fencing on the two sides facing the Black Hall club, plant screen trees to continue the existing line of trees along the warehouse site to the end of the property line between Black Hall Club and the proposed lease site?

57. If not, why not?

Respectfully Submitted,

Black Hall Golf Club

By _____
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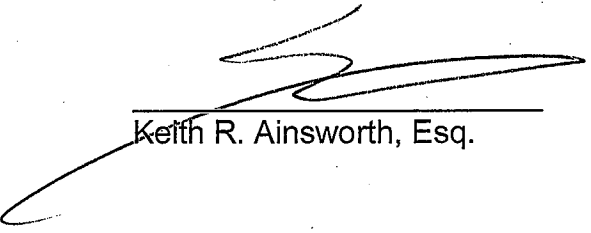
CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 18th day of March, 2010 and addressed to all parties and intervenors on the attached service list and as noted below.

Mr. S. Derek Phelps, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig, 15 copies, plus 1 electronic).

T-Mobile Northeast, LLC c/o Julie Kohler, Esq., Cohen & Wolf, LLP, 1115 Broad Street, Bridgeport, CT 06604 (203) 368-0211/(203) 394-9901 fax jkohler@cohenandwolf.com

Town of Old Lyme c/o The Hon. Tim Griswold, 52 Lyme Street, Old Lyme, CT 06371



Keith R. Ainsworth, Esq.