## STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF SBA TOWER II, LLC FOR

DOCKET NO. 396

A CERTIFICATE OF ENVIRONMENTAL

COMPATIBILITY AND PUBLIC NEED FOR

THE CONSTRUCTION, MAINTENANCE AND

OPERATION OF A TELECOMMUNICATIONS

FACILITY AT 49 BRAINERD ROAD,

NIANTIC (EAST LYME), CONNECTICUT

MARCH 16, 2010

# RESPONSES OF CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS TO TOWN OF EAST LYME PRE-HEARING INTERROGATORIES

On March 1, 2010, the Town of East Lyme issued Pre-Hearing Interrogatories to the Applicant, SBA Tower II, LLC ("SBA"). Question No. 5 requests certain information about the intervening wireless carriers' ability to use a Town-owned parcel, known as Assessor's Parcel 10.3, 14.1, as an alternative to the SBA tower site off Brainerd Road. In an effort to facilitate the free flow of information between all parties and intervenors in Docket No. 396, Cellco Partnership d/b/a Verizon Wireless ("Cellco"), hereby offers the following response to the Town's request for information in Question No. 5.

#### Question No. 5

Please provide your coverage maps for Assessor's Parcel 10.3, 14.1.

### Response

According to information Cellco received from SBA, the Town-owned property identified as Assessor's Parcel 10.3, 14.1 is an approximately 103-acre parcel located to the west of Brainerd Road, south of Route 156 and east of Grants Neck Road. Cellco's assessment of this parcel focuses on four potential tower locations identified on the attached map. These locations

and site coordinates were provided by SBA's project team, and represented as viable alternative tower locations.

Cellco's RF Engineers have determined that a facility at any of these four locations could, at the appropriate antenna height, satisfy Cellco's coverage objectives in East Lyme. In order to satisfy these objectives, however, Cellco would be required to install its antennas at a minimum height of 167 feet above ground level at Location 1; 157 feet above ground level at Location 2; and 147 feet above ground level at Locations 3 or 4. In separate e-mail correspondence, the Town Attorney indicated that the information provided above was sufficient and responsive, and that the Town did not need Cellco to produce coverage plots from each of these locations.

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of March, 2010, a copy of the foregoing was sent via electronic mail to:

Carrie L. Larson, Esq.
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702
clarson@pullcom.com

Russell L. Brown 41 Brainerd Road Niantic, CT 06357 rds@businessbookpress.com

Edward B. O'Connell, Esq.
Tracy M. Collins, Esq.
Waller, Smith & Palmer, P.C.
52 Eugene O'Neill Drive
P.O. Box 88
New London, CT 06320
eboconnell@wallersmithpalmer.com
tmcollins@wallersmithpalmer.com

Daniel M. Laub, Esq.
Christopher B. Fisher, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
cfisher@cuddyfeder.com
dlaub@cuddyfeder.com

Keith R. Ainsworth, Esq. Evans, Feldman & Ainsworth, LLC 261 Bradley Street P.O. Box 1694 New Haven, CT 06507-1594 krainsworth@snet.net

Joseph Raia 97 West Main Street, Unit 9 Niantic, CT 06357 Raia.joseph@sbcglobal.net Representative Ed Jutila
Assistant Majority Leader
Vice Chair, Public Safety and Security Committee
Connecticut General Assembly
37<sup>th</sup> Assembly District
23 Brainard Road
Niantic, CT 06357
Ed.Jutila@cga.ct.gov

Kenneth C. Baldwin

