

**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 208 VALLEY ROAD IN THE TOWN  
OF NEW CANAAN, CONNECTICUT

DOCKET NO. 401

Date: June 28, 2010

**PRE-FILED TESTIMONY OF ASHLEY BONAVENTIA**

**Q1. Please state your name and profession.**

A1. Ashley Bonavenia and I am a program manager for EBI Consulting ("EBI"). EBI is located at 21 B Street, Burlington, MA, 01803.

**Q2. What kind of services does EBI provide?**

A2. EBI is a full service environmental, health and safety consulting firm. It provides a wide array of services for those in the telecommunications industry, including assessments under the National Environmental Policy Act of 1969 ("NEPA").

**Q3. Please summarize your professional background in telecommunications.**

A3. I have a B.S. in Ocean Engineering from the University of Rhode Island. I have extensive experience in Phase I environmental site assessment, NEPA compliance, environmental assessments, SEQRA reviews and remediation consulting services to, among other industries, telecommunication firms. My work with environmental reviews includes analysis of historical properties, wetlands, endangered species habitat, flood plains, and other areas of environmental concerns in relation to proposed and existing telecommunications facilities.

**Q4. What services did EBI provide T-Mobile with respect to the proposed Facility?**

A4. T-Mobile retained EBI to perform NEPA compliance for the proposed telecommunications facility at 208 Valley Road, New Canaan, Connecticut ("Facility"). I performed the NEPA analysis for the proposed Facility.

**Q5. Please describe the results of the NEPA analysis?**

A5. The Facility is categorically excluded from any requirement for further environmental review by the Federal Communications Commission ("FCC") in accordance with the NEPA and no permit is required by the FCC prior to construction of the proposed Facility. Please see the NEPA Summary Report attached to the Application as Exhibit Q.

**Q6. Is the proposed Facility located in an officially designated wilderness area or wildlife preserve?**

A6. No. The Property is not located in a wilderness area and it is not identified as a wildlife preserve or in a U.S. Fish and Wildlife Service National Wildlife Refuge.

**Q7. Is the proposed Facility likely to affect threatened or endangered species or designated critical habitats?**

A7. No. The Facility would not affect threatened or endangered species or designated critical habitats. There are two identified endangered species and one threatened species in Fairfield County. The two endangered species are the Piping Plover and Roseate Tern. The one threatened species is the Bog Turtle. The location

of the Facility does not match the habitats of any of the endangered or threatened species.

**Q8. Is the proposed Facility designed to minimize any impacts on migratory bird species?**

A8. Yes. The design for the proposed Facility would minimize any impact to migratory bird species. The Facility would be less than 200 feet in height and would not use guy wires. Additionally, the Facility would not be lighted.

**Q9. Is the proposed Facility likely to affect any National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands?**

A9. No. The proposed Facility would not affect any National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands.

**Q10. Is the proposed Facility likely to affect any districts, sites, buildings, structures, or objects of significance in American history, architecture, archeology, engineering or culture as listed, or potentially eligible for listing in the National Register of Historic Places?**

A10. No. The proposed Facility would not impact any recognized districts, sites, buildings, structures or objects of significance in American history, architecture, archeology, engineering or culture as listed on the National Register of Historic Places. In a letter dated November 4, 2009, the State Historic Preservation Officer concluded that the Facility would have no such impact. See Exhibit O attached to the Application.

**Q11. Would the proposed Facility affect any Native American religious sites?**

A11. No. EBI consulted with four Native American Indian tribes – the Delaware Nation, the Delaware Tribe of Indians of Oklahoma, the Mashantucket Pequot Tribe, and the Narragansett Indian Tribe – because they might have interests impacted by the construction, operation and maintenance of the Facility. The Delaware Tribe of Indians of Oklahoma and the Mashantucket Pequot Tribe confirmed that they do not have any interests that would be impacted by the Facility. The Narragansett Indian Tribe and the Delaware Nation were unresponsive to EBI's attempts to contact them about the proposed Facility. EBI contacted the FCC after receiving no response from these Tribes. The FCC attempted to communicate with the Tribes. On December 1, 2009, the Delaware Nation responded to the FCC and indicated that the Facility would not impact any of the Tribe's interests. The Narragansett Indian Tribe did not respond to the FCC or EBI's requests for comment. The FCC therefore concluded that the Narragansett Indian Tribe had no interest in the proposed Facility and that EBI had met its obligations for tribal consultation.

**Q12. Would the proposed Facility be located in a floodplain?**

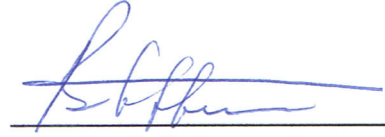
A12. No, the proposed Facility would not be located in a 100 year flood plain.

**Q13. Would the proposed Facility involve a significant change in surface features (i.e. wetlands, deforestation, water diversion)?**

A13. No. The nearest wetland system is more than 100 feet from the proposed Facility compound. The proposed Facility would require the removal of two trees, which would not result in a significant change in surface features.

  
Ashley Bonavenia

Sworn and subscribed to before me this  
28 day of June, 2010.

  
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Notary Public  
My Commission expires

ROSEANN GRIFFITH  
Notary Public, State of New York  
No. 4814557  
Qualified in Suffolk County  
Commission Expires January 31, 2011

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY T-MOBILE  
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DOCKET NO. 401

Date: June 24, 2010

**PRE-FILED TESTIMONY OF CARLO F. CENTORE, P.E.**

**Q1. Please state your name and profession.**

A1. Carlo F. Centore and I am a civil engineer and an employee of Centek Engineering, Inc. ("Centek").

**Q2. What kind of services does Centek provide?**

A2. Centek is a multi-discipline engineering firm with offices located in Branford, Connecticut, that provides, among other services, design and permitting services to wireless providers in the northeast including Connecticut, New York, Massachusetts, Vermont and Rhode Island. Centek develops zoning and construction drawings for the installation of prefabricated equipment shelters and equipment cabinet arrays with supporting antennae on existing structures and for new stand-alone telecommunications towers.

**Q3. Please summarize your professional background in telecommunications.**

A3. I have a B.S. in civil engineering from the University of New Haven. I am a licensed engineer with over twenty-five years of experience. I have approximately

twelve years of experience in the telecommunications industry. My experience includes the planning, design and construction of more than 3,000 wireless telecommunications facilities.

**Q4. What services did Centek provide T-Mobile with respect to the proposed Facility?**

A4. T-Mobile retained Centek to design and prepare the site plans for the proposed telecommunications facility at 208 Valley Road, New Canaan, Connecticut ("Facility"). The site plans included the site access plan, the compound plan and tower elevation for the Facility. In addition, Centek evaluated the site of the proposed Facility at 208 Valley Road, New Canaan, Connecticut ("Property") to determine whether the Facility would require the removal of any trees.

**Q5. Please describe the site of the proposed Facility.**

A5. The Property is a forty-two acre parcel and is designated on the Assessor's Tax Map as Map 44, Block 108, Lot 120. The Property is zoned as two acre residential. Silver Hill Hospital, Inc. owns the Property. The Property is currently developed and includes a psychiatric facility and parking lot. T-Mobile would lease a 1,250 square foot area located in the northern portion of the Property.

**Q6. Please describe the access to the proposed Facility.**

A6. Access to the Facility would be over an existing bituminous drive. T-Mobile would construct a bituminous paved parking area off of the existing drive leading to a

pressure treated wood stepped gravel foot path extending to the Facility compound entrance.

**Q7. Please describe the proposed Facility.**

A7. The Facility would consist of a 120-foot monopole structure with internally mounted antenna arrays and related equipment on the ground at the base on a concrete pad. The Facility would sit within a 1,250 square foot compound, which would be enclosed by an eight-foot high brown cedar board stockade fence. The compound area would sit within the 1,250 square foot leased area. T-Mobile would install panel antennas within the monopole structure at 117 and 107 feet above grade level. The Facility would also accommodate two additional carriers in the Connecticut marketplace. T-Mobile would extend utility services from an existing utility pole on the Property scheduled for replacement through underground conduits to the proposed Facility.

**Q8. Would the construction, operation and maintenance of the proposed Facility require the removal or relocation of any trees?**

A8. Yes. T-Mobile would have to remove three trees, each with a diameter of 6 inches or greater, in constructing the proposed Facility.

**Q9. How much clearing and grading is necessary?**

A9. Construction of the proposed Facility compound and access would result in a net cut (removal) of approximately 365 cubic yards of material. The total area of disturbance would be five thousand square feet; however, areas disturbed beyond those required to accommodate the Facility compound and access would be restored to



preconstruction condition. In my opinion, with appropriate sedimentation and erosion controls, the amount of environmental disturbance would be minimal.

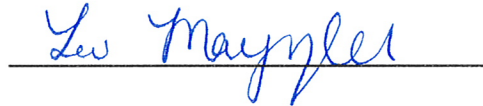
**Q10. Can the tower be designed with a pre-engineered fault to prevent encroachment on adjacent properties?**

A10. Yes, the tower can be designed with a hinge point so as to prevent encroachment on adjacent properties in the event of a tower overload condition; many of the telecommunications facilities approved by the Council have been designed in this manner.



Carlo F. Centore, P.E.

Sworn and subscribed to before me this  
24 day of June, 2010.



Notary Public

My Commission expires ~~My Commission Expires~~ **Dec. 31, 2012**

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

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DOCKET NO. 401

Date: June 23, 2010

**PRE-FILED TESTIMONY OF DEAN E. GUSTAFSON**

**Q1. Please state your name and profession.**

A1. Dean E. Gustafson and I am a professional soil scientist and senior wetland scientist for Vanasse Hangen Brustlin, Inc. ("VHB"). VHB is located at 54 Tuttle Place in Middletown, Connecticut.

**Q2. What kind of services does VHB provide?**

A2. Among many other services, VHB provides a full array of services for the permitting of telecommunications facilities, including wetlands compliance, visual impact analyses and environmental assessments under the National Environmental Policy Act of 1969 ("NEPA").

**Q3. Please summarize your professional background in telecommunications.**

A3. I have a B.S. in plant and soil sciences from the University of Massachusetts. I am a professional soil scientist with over twenty-one years of experience in wetlands consulting. My experience includes wetlands delineation, evaluation, mitigation design, monitoring, stream restoration and permitting before local, state and federal bodies. I

have a particular expertise in wetland identification, wetland impact assessments, wetland mitigation design and oversight, and soil mapping and classification. I have provided wetland consultation for more than one hundred telecommunications facilities.

**Q4. What services did VHB provide T-Mobile with respect to the proposed Facility?**

A4. T-Mobile retained VHB to perform a Visual Resource Evaluation Report and a wetlands compliance analysis for the proposed telecommunications facility at 208 Valley Road, New Canaan, Connecticut ("Facility"). I performed the wetlands assessment for the proposed Facility.

**Q5. What did you do to determine the existence of wetlands on or near the site of the proposed Facility?**

A5. On January 11, 2010, I performed an on-site investigation of the site of the proposed Facility at 208 Valley Road, New Canaan, Connecticut ("Property"). I also reviewed the site plans for the Facility, prepared by Centek Engineering LLC. Based upon the on-site investigation and review of the site plans, I completed a wetlands inspection report, which is attached to the Application as Exhibit K.

**Q6. Based upon your investigation, are there any wetlands located on the Property?**

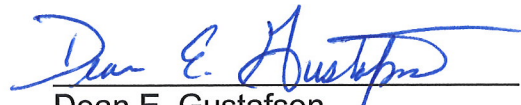
A6. No. There are no wetland systems on the Property. The nearest wetland system is approximately 400 feet from the proposed Facility. This wetland system is associated with Silvermine Brook and located on the opposite side of Valley Road.

**Q7. In your professional opinion, based upon your review of the site plans and the proposed site of the Facility, would the construction, operation and maintenance of the Facility impact any wetland system?**

A7. No. The Facility is located a significant distance from the nearest wetland system; accordingly, the construction, operation and maintenance of the proposed Facility would not have a direct or indirect impact on any wetlands and watercourses.

**Q8. Would the access or utility routing proposed for the Facility impact any wetland system?**

A8. No. The access and utility routing would not have an impact on any wetland systems.

  
Dean E. Gustafson

Sworn and subscribed to before me this  
23rd day of June, 2010.



*Notary Public*  
*My Commission expires*

**KRISTINE M. PAUL**  
**NOTARY PUBLIC**  
MY COMMISSION EXPIRES JAN. 31, 2014

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY T-MOBILE  
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DOCKET NO. 401

Date: June 25, 2010

**PRE-FILED TESTIMONY OF SCOTT HEFFERNAN**

**Q1. Please state your name and profession.**

A1. Scott Heffernan, and I am the president and principal engineer for Transcom Engineering, Inc. ("Transcom"), which is located in Sterling, Massachusetts.

**Q2. What kind of services does Transcom provide?**

A2. Transcom provides wireless design services for both commercial and government projects including, but not limited to, evaluating possible sites for telecommunications facilities, system design, and determining radio frequency ("RF") coverage, capacity and interference for proposed telecommunications facilities.

**Q3. Please summarize your professional background in telecommunications.**

A3. I have a B.S. in Physics from Clark University and Certificates in Telecommunications Engineering and UNIX Programming from Northeastern University. I have over fourteen years of experience in wireless engineering, which includes the design, integration, optimization and management of network build-outs for commercial wireless carriers such as Nextel, AT&T, Wireless, Cingular and Voicestream (T-Mobile's predecessor). I have also been involved in network design for government entities such

as the Department of Homeland Security, Department of the Army, Department of the Navy, and the United States Marine Corps. I have spent the last six years primarily as an independent contractor for T-Mobile, focusing on the design and integration of the T-Mobile wireless network.

**Q4. What services did you provide T-Mobile regarding the proposed Facility?**

A4. I evaluated T-Mobile's existing network in this area of the State and assessed the need for the proposed telecommunications facility at 208 Valley Road, New Canaan, Connecticut ("Facility"). In doing so, I considered the general design of T-Mobile's network, the technical constraints in selecting certain proposed facilities, and the specific need for the Facility. I also evaluated the potential designs for the proposed Facility.

**Q5. Please describe T-Mobile's wireless network in Connecticut.**

A5. T-Mobile's predecessor entities began constructing a wireless network to provide Personal Communication Services ("PCS") in Connecticut in the mid-1990s. T-Mobile is licensed by the Federal Communications Commission to provide PCS service using frequencies in the 1900 MHz range and AWS service using frequencies in the 2100 MHz range. Current efforts are directed to providing signals to areas without coverage and meeting demand for additional capacity within the areas already served. Each new site must be chosen to meet the need for coverage and/or capacity without creating RF interference among sites.

**Q6. What requirements does the nature of wireless technology place on T-Mobile's selection of cellular tower locations?**

A6. Like all personal communications service providers, T-Mobile's wireless network is based on the principle of frequency re-use. T-Mobile must select cellular tower locations so that the towers provide sufficient signal strength overlap to allow a call to be "handed-off" between cellular tower locations without creating unnecessary duplicative coverage and frequency interference. Terrain variations may also limit the siting of cellular towers.

Technological advances in service, such as the availability of data and video services through customer handsets, are also significant factors in system development. Increased customer demand and expectations resulting from those advances drive the need for additional sites.

T-Mobile's required lower limit threshold is -84 dBm, which is expected to provide reliable in-vehicle coverage. A higher threshold level of -76 dBm is the minimum required to provide reliable in-building coverage. At levels below the -84 dBm threshold, T-Mobile's service to customers for voice and data services would experience signal degradation. In addition, levels below -84 dBm would adversely affect T-Mobile's ability to provide reliable E-911 services as mandated by the federal government.

**Q7. Please describe T-Mobile's need for the proposed Facility.**

A7. The Facility would be an integral component of T-Mobile's wireless network in New Canaan. There is a gap in coverage in this area, specifically along Valley Road and Silvermine Road, just east of Route 123, as well as the surrounding area. The Facility, in conjunction with other existing and future facilities in New Canaan and

surrounding towns, is necessary for T-Mobile to provide wireless services to people living and working in and traveling through this area of the State.

**Q8. How did you analyze the efficacy of the proposed Facility?**

A8. I used propagation prediction tools to determine the potential effectiveness of the proposed Facility in meeting the identified coverage need. That analysis took into account T-Mobile's coverage objective, T-Mobile's existing on-air sites in this area of the State and the existing terrain and vegetation. The analysis confirmed that the proposed Facility would provide service to the target area and would improve service generally within this area of New Canaan. The Facility would provide effective service with antenna arrays located at 117 and 107 feet above grade level ("AGL"). At lower heights, the coverage in this area of New Canaan starts to deteriorate and fall below T-Mobile's minimum required threshold of -84 dBm.

**Q9. Was T-Mobile's search for a facility based upon your analysis of need?**

A9. Yes. T-Mobile's search for a facility in this area of New Canaan was based upon my analysis of need. This search was shaped in large part by the previous ruling of the Connecticut Siting Council ("Council") in Docket 243. On October 26, 2004, the Council approved an Application for a Certificate of Environmental Compatibility and Public Need ("Certificate") for a wireless telecommunications facility, with a 120 foot monopole, at 208 Valley Road, New Canaan ("Property"). The Council determined that the facility proposed in 2004 addressed a demonstrated coverage need without adversely impacting the community or the environment. The Certificate expired without the



construction of the facility approved in 2004. T-Mobile has subsequently re-visited its coverage needs in this area of New Canaan and confirmed its need for a telecommunications facility located on the Property.

**Q10. Has a test drive been conducted in this area regarding the proposed Facility?**

A10. Yes. T-Mobile continually drives its on-air sites for network analysis and propagation model tuning purposes. A wireless network is dynamic environment, subject to equipment, frequency and environmental changes. T-Mobile strives to have the most current test drive data available for any given area in its network. This allows for greater accuracy in its current network design of new facilities to ensure that each new facility is a quality edition to the network.

**Q11. Please summarize the basis for the height of the proposed Facility.**

A11. The analysis of this area of New Canaan confirmed that the minimum height required to cover the intended coverage objective is at 117 and 107 feet AGL. At lower heights, the coverage starts to deteriorate and fall below T-Mobile's minimum required threshold of -84 dBm. Accordingly, antennae located at the proposed heights would allow T-Mobile to provide adequate coverage within the target coverage area.

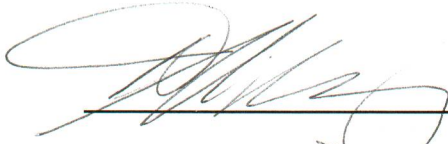
**Q12. Is adequate coverage in this area of New Canaan necessary to provide consistent and reliable 911 service?**

A12. Yes. If the coverage within a specific area is inadequate, then not only does routine call reliability suffer, but so does 911 / emergency call reliability.



  
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Scott Heffernan

Sworn and subscribed to before me this  
25th day of June, 2010.

  
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Notary Public      DAWN E MICHANOWICZ  
My Commission expires      APRIL 8, 2016

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

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DOCKET NO. 401

Date: June 23, 2010

**PRE-FILED TESTIMONY OF MICHAEL P. LIBERTINE**

**Q1. Please state your name and profession.**

A1. Michael P. Libertine and I am the Director of Environmental Services employed by Vanasse Hangen Brustlin, Inc. ("VHB"). VHB is located at 54 Tuttle Place in Middletown, Connecticut. My responsibilities at VHB include managing and overseeing the environmental science and engineering projects, including telecommunications projects, undertaken by VHB's Middletown office.

**Q2. What kind of services does VHB provide?**

A2. Among many other services, VHB provides a full array of services for the permitting of telecommunications facilities, including visual impact analyses, wetlands compliance and environmental assessments.

**Q3. Please summarize your professional background in telecommunications.**

A3. I have assisted in the permitting of over 500 telecommunications projects in New England and New York over the past twelve years. My responsibilities include the coordination and oversight of environmental and land use evaluations, visual impact analyses and regulatory permitting support.

My background includes over eighteen years of consulting in the environmental field. I have a B.S. in natural resources management from the University of Connecticut and a B.A. in marketing from Stonehill College. I am also a licensed Environmental Professional in Connecticut. I have served as the project manager for more than 1,600 environmental site assessments and field investigations for property transfers in Connecticut, Rhode Island, New Hampshire, Massachusetts, New Jersey, New York, Florida and Canada.

**Q4. What services did VHB provide T-Mobile regarding the proposed Facility?**

A4. T-Mobile retained VHB to perform a Visual Resource Evaluation (“Evaluation”) and provide a Visual Resource Evaluation Report (“VRE Report”), as well as a wetlands compliance analysis for the proposed telecommunications facility at 208 Valley Road, New Canaan, Connecticut (“Facility”). I oversaw these activities associated with the proposed Facility.

**Q5. Please describe the process for conducting the Visual Resource Evaluation.**

A5. The Evaluation consists of a predictive computer model and in-field analysis. The predictive computer model assesses the potential visibility of the Facility within a two mile radius (“Study Area”), including private property and/or otherwise inaccessible areas for field verification. The in-field analysis consists of a “balloon float” and drive through reconnaissance of the Study Area. This in-field investigation allows VHB to obtain location and height representations, back-check the initial predictive computer model results and assess the visibility of the proposed Facility from areas accessible to

the public. VHB assesses the results of the predictive computer model and the in-field analysis and incorporates these results into the final viewshed map. In this case, VHB had the opportunity to review in-field conditions via a balloon float on January 14, 2010. The completed VRE Report and viewshed map are included in Exhibit N of the Application.

**Q6. Please describe how VHB prepared the viewshed analysis for the VRE Report.**

A6. VHB uses a computer modeling tool developed by the Environmental Systems Research Institute, Inc. (ESRI), called ArcView® Spatial Analyst, to calculate the areas within the Study Area where the Facility would be visible. This software is based upon data such as the height of the Facility, the Facility's ground elevation, the surrounding topography and existing vegetation. VHB first constructs a digital elevation model, which is derived from Connecticut LiDAR-based digital elevation data produced by the University of Connecticut Center for Land Use Education and Research, to develop a three dimensional topographic layer of the Study Area. A forest canopy layer is then created by hand-tracing (digitizing) mature trees and woodland areas (as depicted on 2006 digital orthophotos [aerial photographs]), converting this into a geographic data layer, and assigning an average height value. During the initial analysis, VHB omits the tree canopy so the only visual constraint is topography. This initial analysis provides a reference point useful in understanding areas that may provide direct lines of sight and determining seasonal visibility fluctuations. Subsequent to the initial analysis, VHB adds the existing vegetation data (in this case, a height of sixty-five feet was assigned to this data layer). VHB also includes an additional data layer, obtained from the

Connecticut State Department of Environmental Protection, depicting significant resource areas such as State forests and parks, recreational facilities, registered historic sites, open space lands and other sensitive visual receptors. VHB depicts on the view shed map any state-or locally-designed scenic roads and Connecticut blue-blazed hiking trails that exist in the Study Area.

**Q7. Please describe how VHB conducted the balloon float.**

A7. On January 14, 2010, VHB raised and maintained a four-foot diameter helium filled weather balloon at the location of the proposed Facility at a height of 120 feet to conduct the initial in-field analysis. After stabilizing the balloon, VHB traveled the local public thoroughfares within the Study Area to verify the computer generated viewshed map and inventory areas of visibility. In conducting the drive-by reconnaissance, VHB focused its evaluation on nearby residential areas and other potential sensitive visual receptors. While the balloon was aloft, VHB took photographs from a variety of locations, settings and vantage points to assist in evaluating where the balloon was visible. VHB also recorded the latitude and longitude of each photograph using a handheld global positioning system (GPS) receiver unit. The photographs were taken using a Canon Digital Rebel camera body and Canon 18mm to 55mm zoom lens. VHB set the lens to fifty millimeters, which most accurately represents the unaided human eye.

**Q8. How did VHB select the locations for the photographs during the in-field investigation?**

A8. VHB selected several of the photograph locations using a preliminary version of the viewshed map to identify areas adjacent to public roads within the Study Area from where the proposed Facility might be visible. VHB selects other locations based on in-field observations made during the time of the balloon float.

**Q9. Please describe the estimated visibility of the proposed Facility.**

A9. The Facility would be partially visible year round to only eight acres within the 8,042 acre Study Area – approximately less than one half of one percent of the total Study Area. A majority of these views would be on the Property and along a limited segment of Valley Road within the immediate vicinity of the proposed Facility. Year-round views are also anticipated from the adjoining municipal water treatment property. There are several smaller areas of potential year-round visibility located to the north, northeast, and southeast of the Facility. This includes approximately four residential properties within the Study Area; three residential properties on Valley Road directly across from the Property and one residential property located along Wardwell Drive.

Approximately sixteen additional acres would have limited seasonal views of the proposed Facility. Most of these views would be within the immediate vicinity of the Facility (within 0.25-mile of the Property). This includes an approximate one tenth mile segment of Valley Road that abuts the Property; an area to the northwest of the proposed Facility that extends to select portions of Wardwell Drive; an area of intermittent seasonal views located near the end of Turning Mill Lane; and an isolated area of seasonal visibility located along Huckleberry Hill Road, Thayer Drive and

Wardwell Drive. VHB estimates that limited seasonal views of the proposed Facility may be achieved from select portions of eight residential properties.

**Q10. Please describe any features that would reduce potential visual impact of the proposed Facility.**

A10. The topography and existing vegetation would reduce the potential visual impact of the proposed Facility. The topography in the area consists of rolling hills ranging from 90 feet above mean seal level (“AMSL”) to 530 feet AMSL. The existing vegetation consists of mixed deciduous hardwood species with an average estimated height of sixty-five feet. The tree canopy covers nearly 5,298 acres of the 8,042 acre Study Area.

Additionally, the proposed Facility is designed with interior mounts. In concealing the antennas within the proposed monopole structure, T-Mobile would limit the visual impact of the Facility.


**Q11. Will the proposed Facility have any visual impact on any sensitive visual receptors such as scenic, historic or recreational sites, hiking trails or parks?**

A11. No views of the Facility are anticipated from any sensitive visual receptors such as scenic, historic or recreational sites, hiking trails or parks.



  
Michael P. Libertine

Sworn and subscribed to before me this  
23<sup>rd</sup> day of June, 2010.

  
Notary Public  
My Commission expires

**KRISTINE M. PAUL**  
**NOTARY PUBLIC**  
MY COMMISSION EXPIRES JAN. 31, 2014

**STATE OF CONNECTICUT  
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DOCKET NO. 401

Date: June 29, 2010

**PRE-FILED TESTIMONY OF RAYMOND M. VERGATI**

**Q1. Please state your name and profession.**

A1. Raymond M. Vergati and I am the vice president of operations for HPC Development, LLC ("HPC") with respect to projects in New England. HPC is located at 46 Mill Plain Road, 2<sup>nd</sup> Floor, Danbury, Connecticut.

**Q2. What services does HPC provide?**

A2. HPC Development is a full service professional consulting and site development firm servicing the wireless telecommunications, broadband, broadcast, and wind energy industries. With respect to the telecommunications industry, HPC provides management services for site development projects including, but not limited to, locating primary and backup sites for telecommunications facilities within a specified search area; coordinating the site design with A&E firms, radio frequency ("RF") engineers and construction managers; and negotiating lease or option agreements.

**Q3. What is your professional background in telecommunications?**

A3. I received a B.S. in finance (with a minor in Spanish) from Seton Hall University. I have approximately twelve years of experience in the telecommunications industry. I have managed site development projects for wireless carriers since 2001, including site acquisition, zoning needs and oversight of construction vendors. Since April of 2008, I have managed site acquisition for T-Mobile regarding numerous sites in Connecticut.

**Q4. What services has HPC provided T-Mobile with respect to the proposed Facility?**

A4. T-Mobile retained HPC to perform a search for possible sites within this area of New Canaan, assist in negotiating the acquisition of a particular site and oversee the development of that particular site. HPC has overseen the development of the telecommunications facility proposed at 208 Valley Road, New Canaan, Connecticut ("Facility"). I assisted in all facets of the site acquisition.

**Q5. How does T-Mobile conduct a search for possible sites?**

A5. T-Mobile decides to seek out a site in an area based upon the needs of its wireless infrastructure and extensive research of the subject area. T-Mobile looks for possible site candidates in areas in which T-Mobile has identified coverage and/or capacity needs. The area targeted is the geographical location where the installation of a site would, based on general radio frequency engineering and system design standards, likely address the identified problem. T-Mobile's goal is to locate sites that will remedy coverage or capacity issues, while resulting in the least environmental impact to the surrounding area.

T-Mobile is sensitive to State and local desires to minimize the construction of new towers, and it does not pursue development of a new facility where an acceptable existing structure can be found. In general, T-Mobile first studies the area in and near the area of need to determine whether any suitable structure exists. If T-Mobile cannot find a structure with appropriate height and structural capabilities, it turns to industrial/commercial areas or individual parcels that have appropriate environmental and land use characteristics. T-Mobile looks for sites that will produce the least amount, if any, environmental impact on the surrounding area. Ultimately, the suitability of each location depends on whether that location would accommodate the coverage need and whether there would be any negative environmental effects.

**Q6. Please describe the search undertaken by T-Mobile for this Facility.**

A6. On October 26, 2004, in Docket No. 243, the Connecticut Siting Council (“Council”) approved an Application for a Certificate of Environmental Compatibility and Public Need (“Certificate”) for the construction and operation of a wireless telecommunications facility, with a 120 foot monopole, at 208 Valley Road, New Canaan, Connecticut (“Property”). The Council determined that the facility proposed in 2004 addressed a demonstrated coverage need without adversely impacting the community or the environment. The Certificate expired without the construction of the facility approved in 2004. On or about February 15<sup>th</sup>, 2008, T-Mobile re-visited its coverage needs in this area of New Canaan.

**Q7. Please explain T-Mobile's reasons for selecting the Property as the site for the Facility.**

A7. In approving the Certificate in Docket No. 243, the Council determined that there was a need for a 120 foot telecommunications facility and that the Property was the most suitable location for that facility. The Council's ruling remains true.

The proposed Facility is necessary to enhance wireless service availability to existing and future T-Mobile wireless device users. The intended coverage area of the Facility includes Valley Road and Silvermine Road, just east of Route 123, as well as the surrounding areas. Enhanced coverage provided by the Facility would allow T-Mobile subscribers to use voice and data services reliably as well as to connect to Emergency 911 services.

T-Mobile's investigation confirmed the Council's previous ruling that the Property remains the best site for the Facility. The area surrounding the Facility has not experienced any significant development. There are no wetlands on or within the immediate vicinity of the proposed Facility. The nearest wetland system is approximately 400 feet to the northeast. Additionally, views of the proposed Facility would be limited by the existing mature vegetation in the area and the stealth design of the tower.

Additionally, based upon T-Mobile's previous site search, the only feasible alternative was 270 Valley Road (Map 44 / Bock 108 / Lot 21), which abuts the Property to the north. The First Taxing District of Norwalk owns the parcel. T-Mobile initially selected this parcel in 2004 since the Property was not available for lease. The Town and those abutters that intervened in the proceedings in 2004 agreed that the Property was a better alternative than this parcel.

**Q8. Has T-Mobile consulted with municipal officials about the proposed Facility?**

A8. Yes. T-Mobile has met its obligations for municipal consultation under General Statutes § 16-50/ (e). On January 29, 2010, T-Mobile submitted a technical report to the First Selectman of New Canaan, the Honorable Jeb Walker. T-Mobile also submitted a technical report to the First Selectman of Wilton, the Honorable William F. Brennan regarding the Facility, because the proposed Facility would be within 2,500 feet of the Wilton boundary. The technical report, a copy of which is included in the bulk filing accompanying the Application, includes specifics about the Property, the Facility, the site selection process and the environmental effects, if any, of the proposed Facility. On March 3, 2010, representatives of T-Mobile met with First Selectman Walker and his Administrative Officer, Thomas R. Stradler, CPA, to discuss the proposed Facility. In a letter dated March 25, 2010, the Town stated that it supports T-Mobile's efforts to improve wireless coverage in the Town. See T-Mobile's responses to the Council's interrogatories. The Town of Wilton did not request a meeting.

**Q9. Has T-Mobile offered the Town of New Canaan the opportunity to co-locate its emergency services equipment on the Facility?**

A9. T-Mobile has expressed to the Town of New Canaan its willingness to provide, free of charge, space on the proposed monopole for municipal public safety communications antennas. The Town of New Canaan has reserved its right to co-locate its equipment on the Facility, but has not yet expressed its intentions to do so.

**Q10. Did T-Mobile post a sign giving the public notice of the hearing on this Application?**

A10. Yes, on or about June 24th, 2010, T-Mobile posted a sign at the Property giving the public notice of the hearing on this Application. Photographs of the sign and an affidavit are appended hereto as Attachment A.

Raymond M. Vergati

Sworn and subscribed to before me this  
29th day of June, 2010.

Karen M. Bartholomew

*Notary Public*  
*My Commission expires*

**KAREN M. BARTHOLOMEW**  
**NOTARY PUBLIC**  
**MY COMMISSION EXPIRES APR. 30, ~~2012~~**  
**2013**



# **ATTACHMENT A**

**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 208 VALLEY ROAD IN THE TOWN  
OF NEW CANAAN, CONNECTICUT

DOCKET NO. 401

Date: June 29, 2010

**AFFIDAVIT OF RAYMOND M. VERGATI**

I, Raymond M. Vergati, do hereby declare and state:

1. I am over the age of 18 years, and believe in the obligation of an oath.
2. I am the vice president of operations of HPC Development, LLC ("HPC")

with respect to projects in New England.

3. I have personal knowledge of the development of the Facility including the specific contents of this affidavit.

4. HPC has overseen the development of the telecommunications facility proposed at 208 Valley Road, New Canaan, Connecticut ("Facility"). I assisted in all facets of the site acquisition.

5. On or about June 24, 2010, a sign was installed at the site of the proposed Facility.

6. On or about June 28, 2010, I viewed the sign installed at the site of the proposed Facility.

7. The sign was installed at the site of the proposed Facility at least ten business days prior to the date of the hearing on the application for a certificate of

environmental compatibility and public need submitted to the Connecticut Siting Council bearing docket number 401.

8. Photographs of the sign posted at the site of the proposed Facility are attached hereto as Exhibit A.

**IN WITNESS WHEREOF**, I have hereunto set my hand and seal this 29th day of June, 2010.

  
Raymond M. Vergati

Subscribed and sworn to before me this 29th day of June, 2010

Karen M. Bartholomew

Notary Public  
My Commission Expires:

KAREN M. BARTHOLOMEW  
NOTARY PUBLIC  
MY COMMISSION EXPIRES APR. 30, ~~2010~~  
2013

# **EXHIBIT A**



6 24 10

**PUBLIC NOTICE**  
The Board of Directors of the City of...  
has adopted a resolution...  
effective...  
for the purpose of...  
the City of...  
June 24, 2010

6 24 10



**PUBLIC NOTICE**

The Board of Directors of the City of Cary, North Carolina, is hereby giving notice of a public hearing to be held on the 15th day of June, 2010, at 7:00 p.m. at the Cary Civic Center, 10000 Cary Parkway, Cary, North Carolina, to consider the proposed construction of a new water treatment facility. The Board of Directors is also giving notice that it is authorized to issue bonds to finance the construction of the proposed facility. The Board of Directors is also giving notice that it is authorized to issue bonds to finance the construction of the proposed facility.

6 24 10