

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

NEW CINGULAR PCS, LLC (AT&T) APPLICATION  
FOR A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR  
THE CONSTRUCTION, MAINTENANCE AND  
OPERATION OF A TELECOMMUNICATIONS  
TOWER FACILITY AT 8 BARNES ROAD IN  
THE TOWN OF CANAAN (FALLS VILLAGE),  
CONNECTICUT. REOPENING OF THIS DOCKET  
PURSUANT TO CONNECTICUT GENERAL  
STATUTES § 4-181a(b) LIMITED TO COUNCIL  
CONSIDERATION OF CHANGED CONDITIONS,  
REVISED TOWER SITE LOCATION MODIFIED  
FACILITY

DOCKET NO. 409A

APRIL 15, 2013

AT&T'S RESPONSES TO SITING COUNCIL INTERROGATORIES

- Q1. Has notice of the modified facility location been provided to all property abutters? If so, please provide proof of notice.
- A1. Yes. A copy of the Siting Council's public notice of the upcoming hearing on April 30<sup>th</sup>, 2013 was sent by first class mail, return receipt requested to all abutting property owners and those agencies and entities that would be notified of an Applicant's intent to file an application with the Siting Council. A list of abutters and other agencies provided with a copy of the public hearing notice is attached in Tab 1 along with proof of mailing.
- Q2. Is the modified facility location the same location that was presented in the Docket 409 Technical Report submitted to the Town in October 29, 2009?
- A2. No. The modified location is further east of the location identified in the Technical Report submitted to the Town in 2009.
- Q3. Please submit detailed site plans of the modified facility, if available.
- A3. Attached in Tab 2 are copies of detailed site plans and included in Tab 3 is a drainage report for the modified facility.
- Q4. Please submit a visibility analysis, in accordance with the Council's July 2012 Application Guide, Section V.G.
- A4. Attached in Tab 4 is a visibility analysis for the modified facility.

- Q5. Would development of the modified facility affect any state or federal special concern, threatened or endangered species?
- A5. AT&T reviewed the most recent CTDEEP NDDB maps (updated December 2012) depicting the project area and has determined that no changes are depicted on or in the vicinity of Cobble Hill since the time of the original submission. The CSC certificate location was situated on the northerly edge of a shaded polygon (indicating a potential species listing). In 2010, the CTDEEP determined that no Federal or State Endangered, Threatened or Special Concern Species occur at the site. The proposed modified location lies over 1,000 feet to the east, outside of any shaded area as shown in the NDDB map included in Tab 5. AT&T is in the process of completing its compliance requirements with respect to NEPA and has not received correspondence from CTDEEP at this time. AT&T anticipates a response consistent with the CTDEEP 2010 determination and will provide the Council with the CTDEEP's determination letter upon receipt.
- Q6. In AT&T's Motion to Reopen, dated February 15, 2013, Tab 3 depicts six census blocks designated as FCC Unserved areas. List the population of each referenced census block using the most recent census data.
- A6. Included below is a copy of the FCC's data for Connecticut areas that were eligible for Auction 901 funds in table form which includes information on population, area and roadway distances.

| BLOCK                   | 2010 CENSUS POPULATION | AREA (sq mi) | ROADS (mi)  |
|-------------------------|------------------------|--------------|-------------|
| 09005425600 <b>1001</b> | 3                      | 0.02         | 0.26        |
| 09005425600 <b>1010</b> | 2                      | 0.15         | 0.17        |
| 09005425600 <b>1021</b> | 5                      | 0.49         | 0.89        |
| <b>NORTHERN BLOCKS</b>  | <b>10</b>              | <b>0.66</b>  | <b>1.32</b> |

| BLOCK                   | 2010 CENSUS POPULATION | AREA (sq mi) | ROADS (mi)  |
|-------------------------|------------------------|--------------|-------------|
| 09005425600 <b>1088</b> | 6                      | 0.7          | 1.54        |
| 09005425600 <b>1096</b> | 0                      | 0.04         | 0.03        |
| 09005425600 <b>1076</b> | 0                      | 0.06         | 0.3         |
| <b>SOUTHERN BLOCKS</b>  | <b>6</b>               | <b>0.8</b>   | <b>1.87</b> |

| 2010 CENSUS POPULATION | AREA (sq mi) | ROADS (mi)  |
|------------------------|--------------|-------------|
| <b>16</b>              | <b>1.46</b>  | <b>3.19</b> |

- Q7. What are the population criteria and existing signal level thresholds that the FCC uses to determine Mobility Fund Eligible Areas?

- A7. To implement Auction 901, the FCC utilized third party data of all wireless carrier networks from 2012 and created a national map correlating underserved and rural areas lacking mobile broadband coverage (3G or better) with census blocks which it determined eligible for subsidized deployment of wireless infrastructure. *USF/ICC Transformation Order*, FCC 11-161 at ¶¶ 8, 28; 47 C.F.R. § 54.1002; Mobility Fund Phase I Eligible Areas, <http://www.fcc.gov/maps/section-706-mobile-deployment-map>. The FCC specifically stated that:

“In the *USF/ICC Transformation Order*, the Commission decided to target Mobility Fund Phase I support to census blocks without 3G or better service at the geometric center of the block, referred to as the centroid, and concluded that American Roamer data is the best available data source for determining where such service is unavailable. More specifically, the Commission concluded that it would consider any census block in the 2010 Census as unserved and thus eligible for support, if an analysis of the American Roamer data indicated that the centroid is not covered by networks using EV-DO, EV-DO Rev A, or UMTS/HSPA or better. FCC 12-641 at ¶ 9.

The FCC’s website states relative to the map included in AT&T’s 4-181(b) motion that:

“this map is made with data current as of January 2012. This map shows the areas identified as potentially eligible for Mobility Fund Phase 1 support. These areas are US Census blocks that lack 3G or better mobile coverage at the centroid of the block according to January 2012 American Roamer data and contain road miles in any of nine road categories. Counties that contain any of these blocks are shaded light gray, and as you zoom in and mouse over these counties you will see more information on the potentially eligible blocks, including population, road miles (S1100, S1200, and S1400 categories only), and the name and number of the CMA in which the blocks are located. Further zooming in allows you to see the US Census tracts that contain these blocks. For additional information visit <http://wireless.fcc.gov/auctions/901/>.”

The American Roamer Data used by the FCC is amalgamated across carriers and was generally acknowledged to over predict existing 3G or better coverage as noted by the FCC as follows:

“Some commenters observe that American Roamer data relies on reporting by existing providers and therefore may tend to over-report the extent of existing coverage. While we intend to be as accurate as possible in determining the extent of coverage, we recognize that perfect information is not available. We know of no data source that is more reliable than American Roamer, nor does the record reflect any other viable options. Moreover, to the extent that American Roamer data may reflect over-reporting of coverage, we note that this makes it less likely that we will mistakenly identify areas already served by 3G networks as unserved, and hence, less likely that we will assign support to cover areas that are not in fact unserved by our definition. Our objective is, of course, to identify unserved areas as accurately as possible.” FCC 11-161 at ¶336

- Q8. What FCC designated Unserved census blocks would be served by the modified facility? Which of the census blocks would be 100 percent served?

A8. The table below includes the FCC designated Unserved census blocks that will be served by the proposed facility and the percentage served.

| <u>Unserved Census Block</u> | <u>Percentage Served</u> |
|------------------------------|--------------------------|
| 1001:                        | 100%                     |
| 1010:                        | 100%                     |
| 1021:                        | 100%                     |
| 1088:                        | 72%                      |
| 1096:                        | 99.8%                    |
| 1076:                        | 99%                      |

Q9. Is AT&T mandated to provide service to the FCC designated Unserved census blocks?

A9. No.

Q10. Does AT&T intend to apply for Universal Service Funds to construct the facility?

A10. No.

Q11. Are there any schools or commercial day care facilities within 250 feet of the modified facility location?

A11. No.

Q12. How many residential dwellings are within 1,000 feet of the modified site location? What is the distance to the nearest residential dwelling?

A12. There are no residences within 1,000' of the modified site location. The closest residence is 1,580' to the north and is located at 96 Barnes Road.

Q13. What type of fuel would be used for the on-site generator? How long can it operate before it needs to be refueled? Describe the containment system for the fuel tank.

A13. The fuel for the on-site generator is diesel fuel. The generator can operate for 48 hours at full demand. The containment system consists of a UL142 secondary containment tank (double wall) and a 2 gallon overflow containment with alarm.

Q14. Identify the safety standards and/or codes by which equipment, machinery, or technology would be used or operated at the proposed facility?

A14. The safety standards are the OSHA (Occupational Safety and Health Administration) codes and regulations.

Q15. Would the site require FAA tower lighting/markings?

A15. No. See the attached FCC Tower information in Tab 6.

- Q16. In AT&T's May 20, 2011 filing to the Council, Response 2 discussed the results of an investigation into a potential two tower solution. AT&T identified two possible locations for "southern tower" Dean Property or Hodgkinson Property as potential candidates for a "south tower". Provide a coverage model for both sites, identifying the address of the properties, geographic coordinates and elevation of the modeled locations, and the tower height used for each model.
- A16. Included behind Tab 7 are coverage plots for AT&T's analysis of two locations on the Dean Property and a location on the Hodgkinson Property for towers heights up to 250' AGL. Each plot in Tab 7 includes the address, geographic coordinates and elevation of the modeled locations, and the tower height analyzed. These plots demonstrate that even at heights of 250' AGL, a "southern tower" at either the Dean locations or the Hodgkinson property will not provide comparable coverage as the Modified Site Location.
- Q17. What frequency was used for the coverage models in AT&T's Motion to Reopen, dated February 15, 2013, Tab 4?
- A17. The frequency for the coverage models in Tab 4 of AT&T's Motion to Reopen is 850MHz cellular frequency.
- Q18. Provide a coverage model depicting AT&T's existing coverage, including the approved Cellco 188 Route 7 South facility.
- A19. Attached behind Tab 8 is the coverage plot depicting AT&T's existing coverage including the approved Cello 188 Route 7 South facility and the Applicants also refer the Council to: Docket 409, AT&T Exhibit 1, Tab 1.
- Q19. Estimate the following for the modified site location for both in-vehicle and in-building service:
- a) coverage area (in square miles) with corresponding population and mileage of major and secondary roads;
  - b) coverage area minus areas of existing coverage (in square miles) with corresponding population and mileage of major and secondary roads.
- A19. The requested estimates for the modified site location for both in-vehicle and in-building service are provided in the table below.

Modified Site Location

|         | Isolation  |           |       |            | Incremental |       |  |
|---------|------------|-----------|-------|------------|-------------|-------|--|
|         | Area       |           |       | Area       |             |       |  |
| -74 dBm | 13.74      | sq. mi.   |       | 9.06       | sq. mi.     |       |  |
| -82 dBm | 21.76      | sq. mi.   |       | 12.22      | sq. mi.     |       |  |
|         |            |           |       |            |             |       |  |
|         | Population |           |       | Population |             |       |  |
| -74 dBm | 359        |           |       | 218        |             |       |  |
| -82 dBm | 660        |           |       | 357        |             |       |  |
|         |            |           |       |            |             |       |  |
|         | Roads (mi) |           |       | Roads (mi) |             |       |  |
|         | Main       | Secondary | Total | Main       | Secondary   | Total |  |
| -74 dBm | 7.33       | 9.33      | 16.66 | 5.63       | 6.85        | 12.48 |  |
| -82 dBm | 9.18       | 14.52     | 23.70 | 5.94       | 9.50        | 15.44 |  |

These estimates also provided for the CSC Certificate Location in the table below.

CSC Certificate Location

|         | Isolation  |           |       |            | Incremental |       |  |
|---------|------------|-----------|-------|------------|-------------|-------|--|
|         | Area       |           |       | Area       |             |       |  |
| -74 dBm | 18.58      | sq. mi.   |       | 11.03      | sq. mi.     |       |  |
| -82 dBm | 28.67      | sq. mi.   |       | 12.23      | sq. mi.     |       |  |
|         |            |           |       |            |             |       |  |
|         | Population |           |       | Population |             |       |  |
| -74 dBm | 858        |           |       | 448        |             |       |  |
| -82 dBm | 1638       |           |       | 478        |             |       |  |
|         |            |           |       |            |             |       |  |
|         | Roads (mi) |           |       | Roads (mi) |             |       |  |
|         | Main       | Secondary | Total | Main       | Secondary   | Total |  |
| -74 dBm | 11.93      | 17.75     | 29.68 | 9.61       | 13.88       | 23.49 |  |
| -82 dBm | 16.99      | 32.77     | 49.76 | 8.85       | 18.64       | 27.49 |  |

A comparison of the tables above shows that the modified site location results in less coverage than the CSC certificate location.

CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and fifteen copies of the foregoing was sent electronically and by overnight mail to the Connecticut Siting Council and:

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Dated: April 15, 2013



Lucia Chiocchio

cc: Michele Briggs, AT&T  
Christopher B. Fisher, Esq.