

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY CELLCO
PARTNERSHIP d/b/a VERIZON WIRELESS,
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED
FOR A TELECOMMUNICATIONS FACILITY
AT 36 RITCH AVENUE, IN THE TOWN OF
GREENWICH, CONNECTICUT

DOCKET NO. 414

Date: June 7, 2011

**POST-HEARING BRIEF OF
INTERVENOR T-MOBILE NORTHEAST LLC**

Pursuant to § 16-50j-31 of the Regulations of Connecticut State Agencies, T-Mobile Northeast LLC ("T-Mobile") submits this post-hearing brief in support of the above-captioned Application for Certificate of Environmental Compatibility and Public Need ("Application"). This brief addresses T-Mobile's need for a facility in the area of the facility proposed by Cellco Partnership d.b.a. Verizon Wireless ("Verizon").¹

I. BACKGROUND

On December 15, 2010, Verizon filed the Application with the Connecticut Siting Council ("Council"), seeking to construct, operate and maintain a wireless telecommunications facility ("Facility") at 36 Ritch Avenue, Greenwich ("Property"). On December 16, 2010, T-Mobile filed a Petition to Intervene in Docket 414, as the Facility would be an important component of T-Mobile's network design in Fairfield County, pursuant to General Statutes § 16-50n and Regulations of Connecticut State Agencies § 16-50j-15a. (*Verizon Exhibit 1; T-Mobile, Exhibit 1.*)

¹ T-Mobile submits its Proposed Findings of Fact contemporaneously with this Post-Hearing Brief.

T-Mobile would locate up to 3 antennas on the Facility with T-arms at 77 feet above grade level ("AGL"). T-Mobile would install a Nortel S12000 GSM cabinet, with a maximum radio capacity of 12 radios (4 per sector) at 25 Watts output power per radio, or a similar cabinet. T-Mobile would also install an Ericsson RBS3106 UMTS cabinet, with a maximum carrier count of 6 at 40 Watts per carrier, or a similar cabinet. T-Mobile would utilize battery back-up for emergency power. (*T-Mobile First Interrog. Resp.*)

II. A SIGNIFICANT PUBLIC NEED EXISTS FOR THE FACILITY

General Statutes § 16-50p (a) (3) (A) mandates that the Council "shall not grant a certificate, either as proposed or as modified by the council, unless it shall find and determine . . . [that] a public need for the facility and the basis of the need" The record demonstrates amply that there is a significant public need for the Facility, specifically a need for T-Mobile.

There is a coverage gap in T-Mobile's network in the areas surrounding the proposed Facility. The coverage gap consists of coverage below T-Mobile's minimum design threshold of -84 dBm. The Facility would remedy the existing coverage gap in this area of the Town of Greenwich ("Town"), specifically along Interstate 95, Delevan Avenue, Byram Road and Ritch Avenue, east of Route 1, as well as the residential and business areas surrounding the Delevan Avenue and Byram Road corridors in the vicinity of the proposed Facility. Accordingly, the Facility would be an integral component of T-Mobile's wireless network in the Town. (*Pre-Filed Testimony of Scott Heffernan ["Heffernan,"] pp. 3-4; T-Mobile's Responses to the Council's First Set of Interrogatories ["T-Mobile First Interrog. Resp."].*)

To provide effective coverage in the area of the proposed Facility, T-Mobile would need to mount its antenna array at 77 feet above grade level ("AGL"). An antenna array at 77 feet AGL would allow T-Mobile to overcome the mature vegetation and topography in the area, and achieve the coverage objective. This height would also allow T-Mobile to provide reliable 911/emergence call service to T-Mobile users. Therefore, the Facility satisfies a significant need for both T-Mobile and the public. (*Heffernan, pp. 4-5; T-Mobile First Interrog. Resp.*)

The record establishes that the Facility would alleviate coverage discrepancies for T-Mobile's network. Other deployment technologies would not remedy this coverage gap.² The Facility, therefore, would meet a significant public need for improved wireless telecommunications in the Town.

Additionally, the approval of the Facility would comport with the Connecticut legislature's determination that the sharing of towers to avoid the unnecessary proliferation of towers is in the public interest. General Statutes § 16-50aa; see also General Statutes §16-50p (b) (1) (A). The Facility would provide co-location opportunities for T-Mobile and AT&T, as well as the Town if so desired.

III. CONCLUSION

The record supports the approval of a certificate for the Facility. The Facility is necessary to provide adequate wireless coverage in this area of the Town for T-Mobile, Verizon and AT&T. T-Mobile requests that the Council issue a certificate for the

² Although alternative deployment technology is governed by federal law, T-Mobile provided detailed information about the feasibility of outdoor Distributed Antenna Systems ("DAS"). DAS is not a feasible deployment technology for T-Mobile's coverage objective. (*T-Mobile's Responses to the Intervenor, John Hartwell's, First Set of Interrogatories May 9, 2011 Hearing Transcript, pp. 54-57.*)

Facility, reflecting in its Decision and Order, consistent with General Statutes § 16-50x, that such approval satisfies and is in lieu of all local and state approvals and certifications.

**THE INTERVENOR,
T-MOBILE NORTHEAST LLC**

By



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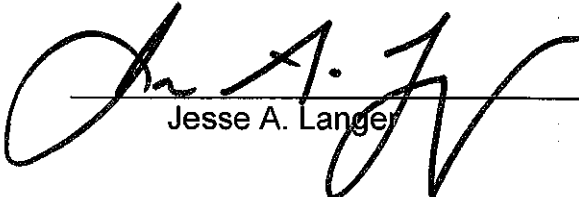
CERTIFICATION OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and regular mail, postage prepaid, to all parties and intervenors of record, as follows:

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