

**STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL**

RE: APPLICATION BY CELCO  
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: April 28, 2011

**INTERROGATORY RESPONSES TO JOHN HARTWELL FROM  
INTERVENOR T-MOBILE NORTHEAST LLC**

The Intervenor, T-Mobile Northeast LLC ("T-Mobile"), submits the following responses to the second set of Pre-Hearing Interrogatories propounded by John Hartwell in connection with the above-captioned Application.

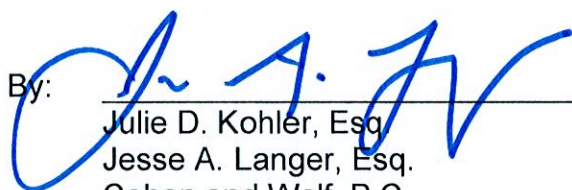
1. In my previous interrogatories sent on March 14th in the first paragraph I asked why does Celco feel they are above this legal agreement which neighbors depended on and if approved will lead to costly legal action and was recognized by T-Mobile in an article in the Greenwich Time dated Feb 8th 2010? I assume everybody is aware this question should have read "Why does T-Mobile feel they are above this legal agreement" However, I need to ask it again since T-Mobile responded to this question by saying "T-Mobile has not responded to the legality of the settlement referenced in Interrogatory 1. Therefore, the question still remains "Why does T-Mobile feel they are above this legal agreement?"
- A1 T-Mobile reiterates its response to the first interrogatory in Mr. Hartwell's First Set of Interrogatories. In addition, T-Mobile responds that it was not a party to the "settlement" referenced in interrogatory 1. T-Mobile is not the applicant in this Docket and, accordingly, questions concerning the legality of the proposed telecommunications facility are best directed to the applicant, Cellco Partnership d.b.a. Verizon ("Verizon"). Should the Council approve the pending Application for a Certificate of Environmental Compatibility and Public Need, T-Mobile would locate its equipment on the facility, as proposed and constructed by Verizon. T-Mobile would respectfully refer Mr. Hartwell to Verizon's response to the first interrogatory regarding the legality of the "settlement" to the pending application.**

2. Also, in your response to Interrogatory 1 you state the Greenwich Time article I reference related to a different telecommunications facility proposed by T-Mobile. The February 8, 2010 article (attached) stated "T-Mobile wrote the existing flag-pole structure at 34 Ritch Ave. would have to be extended 'because it cannot accommodate T-Mobile's arrays. AT&T isn't interested in increasing the height because of previous litigation it had with the town, T-Mobile said" Since this quote is about the proposed site at 36 Ritch Avenue, what facility are you referencing in your response?
- A2 T-Mobile reiterates its response to the first interrogatory in Mr. Hartwell's First Set of Interrogatories. In addition, T-Mobile responds that the article concerned T-Mobile's efforts to propose a telecommunications facility at Talbot Lane, Greenwich. At that time, as referenced in the article, T-Mobile had inquired about Cingular Wireless PCS, LLC's ("AT&T") interest to alter the configuration of the existing telecommunications facility at 36 Ritch Avenue as an alternative to the proposed facility at Talbot Lane. In that article, T-Mobile articulated its understanding of AT&T's interest in developing the existing telecommunications facility at 36 Ritch Avenue at that time.**
3. ATT/T-Mobile announcement - The announcement of this merger would if approved make it unnecessary to have T-Mobile on this proposed tower thus eliminating seven feet off the height of the tower. What are your plans to make sure the seven feet are removed or isn't it smarter to wait for the merger so your customers could use the existing AT&T antennas? If this cell tower application is not approved won't your customers be accessing the current tower as it exists today with no additional cost since this would not be in conflict with the legal settlement which bars additional carriers on this site.
- A3 AT&T and T-Mobile USA have executed an agreement whereby AT&T will purchase T-Mobile USA. This agreement, however, will undergo an extensive regulatory review, which is estimated to last approximately 12 months. Until the transaction is finalized, T-Mobile USA must continue to operate as an independent company and compete in the market place. T-Mobile USA will continue to challenge the marketplace by offering the latest wireless mobile internet services. Additionally, the Connecticut Siting Council typically addresses the issue of dormant or unused facilities in its decision and orders.**

Respectfully Submitted,

T-MOBILE NORTHEAST LLC

By:



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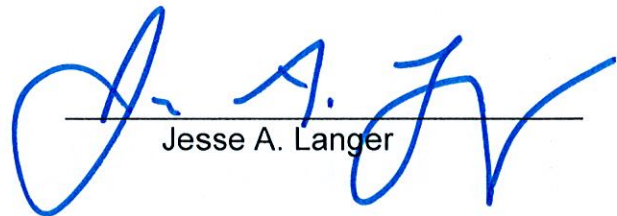
**CERTIFICATION**

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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