

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 415
D/B/A VERIZON WIRELESS FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE :
AND OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY AT 87 :
WEST QUASSET ROAD, WOODSTOCK, :
CONNECTICUT : SEPTEMBER 20, 2011

PRE-FILED TESTIMONY OF ALEXANDRIA M. CARTER

Q.1. Please describe your position with Cellco Partnership d/b/a Verizon Wireless.

A. I am a Regulatory Manager for Cellco Partnership d/b/a Verizon Wireless' ("Cellco") New England West Region, which covers Connecticut, western Massachusetts and Vermont, charged with the acquisition and development of Cellco's wireless telecommunications facilities.

Q.2. Please summarize your professional background.

A. I have been working as a Regulatory Manager for Cellco since 1994. Prior to joining Cellco, I worked for five years as a private planning consultant and for ten years as the Town Planner and Zoning Officer for the Town of North Haven. I have been involved in the land use profession for approximately 25 years working in both the private and public sectors. I have also served on the Canton Planning Commission and was a member of the North Haven Board of Selectmen.

Q.3. Would you please briefly summarize the history of Cellco's efforts to work with American Tower Corporation (ATC) to rebuild its existing lattice tower at 87 West Quasset Road in Woodstock?

- A. In the Docket No. 415 application, we mentioned that we were aware of discussions dating back to 2007 between Cellco and ATC regarding ATC's plans to build a new monopole tower north of its existing light weight lattice tower at 87 Quasset Road. After reviewing Cellco's files further, I was able to determine that discussions with ATC about its intent to replace the existing tower began much earlier than that, and actually commenced in September of 2002. Attached behind Tab 1 is a redacted copy of a "Deal Memo" dated September 10, 2002 which mentions that ATC intends to rebuild the existing tower so that Cellco could sectorize its Woodstock Facility. I know from my involvement in this matter, that these discussions continued on a fairly regular basis between 2007 and just before we filed our application with the Council on January 28, 2011. Attached behind Tab 2 is a short string of e-mails between Michelle Kababik with Cellco and Heather Douglas with ATC. On January 5, 2011, three weeks before we filed our Council application, Cellco contacted ATC and told them that we couldn't wait any longer and that we were going to move forward with our own application for a new tower site at the Quasset Hill Farm. Additional examples of Cellco's effort to work with ATC can be found in two other e-mail exchanges in 2009 and 2011, between Ms. Douglas and Steve Schadler, Cellco's Real Estate Consultant in which ATC claims that they are still dealing with some "challenging issues" including the need for certain "easements" before the project could commence. (See e-mails attached behind Tab 3).

Cellco went out of its way to cooperate with ATC and delayed the redevelopment of its Woodstock Facility for nearly nine (9) years on the promise by ATC that it would rebuild its existing tower. I have no confidence that they are anymore committed to this project today than they were in 2002 or 2007 or 2008 or 2009 or 2010 or even the beginning of 2011.

Q.4. Are you familiar with the alternative tower location described by ATC at Quasset Hill Farm?

- A. Yes. I have reviewed the plans submitted by ATC that show the new monopole tower located about 20' north of the existing ATC lattice tower. The tower is located in the southeast corner of the 30 acre Quasset Hill Farm parcel, 20 feet from the nearest property line to the south and 85 feet from the property line to the east, along West Quasset Road. The ATC plans show the development of a 140' tower, however, Mark Brauer, Cellco's RF Engineer has determined that Cellco would need an antenna height of 160' at this location to satisfy our wireless service objectives.

Q.5. Based on your tower siting experience with the Council, do you have an opinion on the ATC alternative tower location in the southeast corner of the Quasset Hill Farm parcel?

- A. Yes. Regardless of the history of the Cellco/ATC relationship at this site, I strongly believe that locating a 160' monopole tower in the southeast corner of the 30-acre Quasset Hill Farm parcel would be inconsistent with Council policy and practice. I have been preparing and presenting applications to the Council for more than 17 years.

I am convinced that if Cellco came to the Council with an application for a new 160' monopole tower located in the southeast corner of this 30-acre parcel, within 20 feet of the nearest property line and 235 feet of the nearest residences, the Council would ask us to

consider an alternative location more toward the center of the subject parcel? This practice of exploring and potentially finding less obtrusive alternative sites has played out in several recent Council dockets. For example, in Cellco's East Woodstock application (Docket No. 397), the Council asked Cellco to consider 4 or 5 different alternative tower locations on the 44-acre subject parcel in an effort to reduce potential impacts the tower might have on residences to the north of the proposed cell site location. In SBA's East Lyme Docket No. 396, the Council again asked the applicant to explore alternative tower locations on the same parcel to reduce impacts on nearby residences. These are just two of many examples of how the Council has explored less intrusive alternatives when siting telecommunications facilities.

For all the reasons discussed above, I strongly believe that the tower location described in the Cellco application is superior to the ATC option in the southeast corner of the parcel.

Q.6. What about the Council's preference to maintain, at the end of this proceeding, only one tower at Quasset Hill Farm? How can this be achieved?

- A. Based on submissions made by ATC, it appears as though ATC will commit to removing its existing lattice tower only if the Council approves the construction of its new monopole in the southeast corner of Quasset Hill Farm. ATC claims that if the Docket No. 415 tower is approved and Cellco terminates its lease for the existing tower, leaving the structure vacant, ATC would market the tower to other wireless carriers. It appears as though ATC is trying to pressure the Council into making a bad siting decision (by approving the ATC alternative tower site) so that the Council might adhere to its policy regarding the unnecessary proliferation of towers.

While there are no guarantees, I think the more likely and preferred scenario might play out like this. The Council should approve the Cellco application as proposed and allow the construction of a new 150' tower in the remote, central portion of the 30-acre Quasset Hill Farm, far from the closest residences to the southeast. The existing ATC tower would remain on site, unoccupied and unusable given its structural limitations. There would be no need for ATC to construct a new monopole near its existing tower, especially with the new Cellco tower located a short distance away on the same parcel. The new Cellco tower would certainly be a more attractive option for other wireless carriers and local emergency service providers. At that point, ATC would be paying rent for a tower site that is not bringing in any revenue to the company. This would, in my experience likely result in ATC terminating its ground lease with the property owner. Under the terms of its existing lease, if it terminates, ATC must remove the tower and all of its related improvements.

I would also point out that Article 1 Section 17.7 of the Woodstock Zoning Regulations requires that a "wireless telecommunications facility not in use for 12 consecutive months shall be removed by the facility owner and property owner at such party's expense".

Q.7. Does this conclude your testimony?

A. Yes.

The statements above are true and complete, to the best of my knowledge.

9/19/11
Date

Alexandria M. Carter
Alexandria M. Carter

Subscribed and sworn before me this 19th day of Sept., 2011.

Kenneth C. Baldwin
Kenneth C. Baldwin
Commissioner of the Superior Court

CERTIFICATION

I hereby certify that on this 20th day of September, 2011, a copy of the foregoing was sent,
postage prepaid, to the following parties and intervenors:

Brandon Ruotolo, Zoning Attorney
American Tower Corporation
10 Presidential Way
Woburn, MA 01801


Kenneth C. Baldwin

TAB 1

Revision: 11/28/01
Submittal Date: 09/09/02
Field Attorney: M.Dubuque
Business Unit: 10025
System: WIN 141

Region: New England West
Project Name: Woodstock, CT
Candidate Name: Woodstock-American
Department ID: 9912010000
Cost Center: NA
Project #: NA

CONFIDENTIAL
PROSPECTIVE LOCATION "DEAL MEMO"
FIELD APPROVAL FOR CONTRACT

Manager – Real Estate/Zoning:

M. Kababik

Area Manager – Real Estate/Zoning:

ARB

A. Befera

9/10/02

Regional Network Director:

R. Enright

R. Enright

Date: 9/10/02

Prioritization:

Relevant Terms:

1. Verizon is sectorizing site. Going from 3 omni whips – 3 runs of Coax - to 12 panel antennas – 12 runs of coax.
2. American Tower purchased site and is rebuilding/strengthening tower to accommodate other carriers and to allow us to sectorize. Verizon is not contributing to the tower rebuild or strengthening.

COMPLETE BELOW FOR LEASE:

OLD Rent: [REDACTED] annually

NEW Rent: [REDACTED] annually commences on installation of antennas.

Rent Escalations: Per MLA

Terms: (4) five year terms

Local Permits Received: NA

Local Permits Required: Building and Zoning, Design

Commencement Date: Upon Installation of Sectored Array

Owner's Complete Name:

American Tower

Agent Information: Kevin Gallagher

Owner's Complete Name:

American Tower

Agent Information:

Kevin Gallagher

Owner's Complete Mailing Address:

Same as above.

Phone #: 617-947-0917

Fax #: 617-585-7676

Fed. ID #: On File at HQ

Form of Ownership:

Legal Name of Signee(s): TBD

Owner's Attorney Information: None

Where contract should be forwarded? Field, M.Dubuque

Required originals for owner (1 or 2?) 2

Complete Property Address:

(Street) 87 West Quassett Road

(County) Windham

(Township)

(City, State, Zip) Woodstock, CT

Property Legal Description:

Deed, Book, Page: Book Page ; Registered No ;

Office of Recording: Woodstock

Verizon Entity: Cellco Partnership d/b/a Verizon Wireless

TAB 2

Baldwin, Kenneth

From: Kababik, Michelle [Michelle.Kababik@VerizonWireless.com]
Sent: Monday, July 11, 2011 11:53 AM
To: Baldwin, Kenneth
Subject: FW:

Thank You,
 Michelle Kababik
 VZW- New England West
 Mgr Equipment Engineering & Inventory
 Desk 860-803-8294
 Mobile 860-919-7500
 Fax 203-741-7121

From: Heather Douglas [mailto:Heather.Douglas@AmericanTower.com]
Sent: Wednesday, January 05, 2011 9:40 AM
To: Kababik, Michelle
Cc: Rea, Rachel
Subject: RE:

Thank you for the candid responsive. I completely understand and appreciate your honesty. As you know, my main fear was going to siting counsel and impeding your application with our drop and swap application. I will advise my team on your status.

Heather M. Douglas
Territory Manager-Business Development
Northeast (New England/NY/NJ)
American Tower Corporation
 10 Presidential Way
 Woburn, MA 01801
 +781 926 4645 (office)
 +617 678 2367 (cell)
heather.douglas@americantower.com



From: Kababik, Michelle [mailto:Michelle.Kababik@VerizonWireless.com]
Sent: Wednesday, January 05, 2011 9:37 AM
To: Heather Douglas
Cc: Rea, Rachel
Subject: RE:

We have spent a lot of money and are ready to file this site this month. My upper management does not want to wait to see if ATC will get it completed this time. I know it's not your fault but we have waited for close to 4 years for this and couldn't wait. It's the only site in our system with whip antennas.

7/27/2011

Thank You,
Michelle Kababik
Network-Mgr Equip Engineering
East Hartford, CT
Desk 860-803-8294
Mobile 860-919-7500
Fax 203-741-7121

From: Heather Douglas [mailto:Heather.Douglas@AmericanTower.com]
Sent: Wednesday, December 22, 2010 2:41 PM
To: Kababik, Michelle
Subject:

Any more news on Woodstock?

Heather M. Douglas
Territory Manager-Business Development
Northeast (New England/NY/NJ)
American Tower Corporation
10 Presidential Way
Woburn, MA 01801
+781 926 4645 (office)
+617 678 2367 (cell)
heather.douglas@americantower.com



TAB 3

From: Heather Douglas [Heather.Douglas@AmericanTower.com]
Sent: Monday, August 17, 2009 11:52 AM
To: steve@vssinc.net
Subject: RE: S Woodstock Rebuild, CT #272711

Yes, it is still in process. We have some challenging issues, i.e. rebuilding of the rock wall and easements over both abutting land parcels (1 being organic farmer, etc.) we are again pushing to try and complete the work post farming season, but need them to sign off on the construction easements.

Heather M. Douglas

Heather M. Douglas
American Tower
Territory Manager-Business Development
Northeast (New England/NY)
10 Presidential Way
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(781) 926-4645 (office)
(617) 678-2367 (cell)
(781) 926-4555 (fax)
heather.douglas@americantower.com

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From: Stephen Schadler [mailto:steve@vssinc.net]
Sent: Monday, August 17, 2009 11:48 AM
To: Heather Douglas
Subject: S Woodstock Rebuild, CT #272711

Hi Heather,
Can you let me know if there's any real movement by ATC on the Woodstock rebuild to allow VzW to sectorize their antennas? I know the site has been discussed for a few years now, but it doesn't seem like anything has changed.

Thanks,
Steve Schadler
VitalSite Services, Inc. / Verizon Wireless
99 East River Drive, 9th Floor
East Hartford, CT 06108
Phone (508) 887-0357
Fax (860) 803-8300

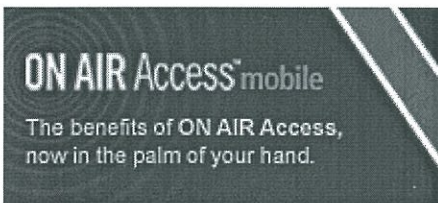
Baldwin, Kenneth

From: Stephen Schadler <steve@vssinc.net>
Sent: Thursday, August 04, 2011 11:29 AM
To: Baldwin, Kenneth
Cc: 'Befera, Anthony'; 'Carter, Alexandria M'
Subject: FW: S Woodstock Rebuild, CT #272711

From: Heather Douglas [<mailto:Heather.Douglas@AmericanTower.com>]
Sent: Friday, April 08, 2011 1:27 PM
To: steve@vssinc.net
Cc: Rea, Rachel; Carter, Alexandria M
Subject: RE: S Woodstock Rebuild, CT #272711

Stephen: ATC is still deciding what course of action to take for our site. We did not want to remove the tower, we wanted to rebuild our site and that process has now only ceased due to us not wanting to create any issues for VZW with the CSC. We would prefer to work with VZW and have them locate on our site as initially proposed.

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heather.douglas@americantower.com



From: Stephen Schadler [<mailto:steve@vssinc.net>]
Sent: Friday, April 08, 2011 9:10 AM
To: Heather Douglas
Cc: 'Rea, Rachel'; 'Carter, Alexandria M'
Subject: RE: S Woodstock Rebuild, CT #272711

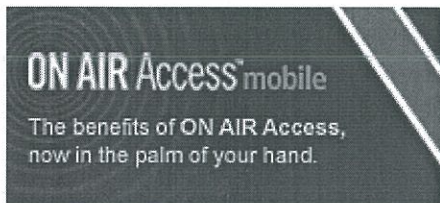
Hi Heather,
Just following up on this? I need to get back to the CSC by early next week.

Thanks,
Steve

From: Heather Douglas [<mailto:Heather.Douglas@AmericanTower.com>]
Sent: Monday, March 28, 2011 3:14 PM
To: steve@vssinc.net
Cc: Rea, Rachel; Carter, Alexandria M
Subject: RE: S Woodstock Rebuild, CT #272711

I will review with our development team and advise.

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From: Stephen Schadler [<mailto:steve@vssinc.net>]
Sent: Monday, March 28, 2011 3:13 PM
To: Heather Douglas
Cc: 'Rea, Rachel'; 'Carter, Alexandria M'
Subject: RE: S Woodstock Rebuild, CT #272711

Hi Heather,

As you know, Verizon Wireless will be proposing their own new monopole at this property since ATC has failed to rebuild their existing tower making it compatible to hold a full array of Verizon's panel antennas. This is the only non-sectorized site left in CT and has been a high priority for Verizon for the past four years. Can you please let me know what ATC's plans will be for their tower if Verizon receives CT Siting Council (CSC) approval and removes their equipment from the ATC tower? Will you be taking your tower down? The CSC would like to know.

Thanks,

Stephen Schadler
VitalSite Services, Inc.
Real Estate Consultant / Verizon Wireless
99 East River Drive, 9th Floor
East Hartford, CT 06108
Phone (508) 887-0357
Fax (860) 290-8951

From: Heather Douglas [<mailto:Heather.Douglas@AmericanTower.com>]
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Subject: RE: S Woodstock Rebuild, CT #272711

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