

JESSE A. LANGER

PLEASE REPLY TO: Bridgeport
E-Mail Address: jlanger@cohenandwolf.com

August 9, 2011

VIA FEDERAL EXPRESS and ELECTRONIC MAIL

Ms. Linda Roberts
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 417 – Application by T-Mobile Northeast LLC for a Certificate of Environmental Compatibility and Public Need for a Telecommunications Facility at Moose Hill Road, Guilford, Connecticut

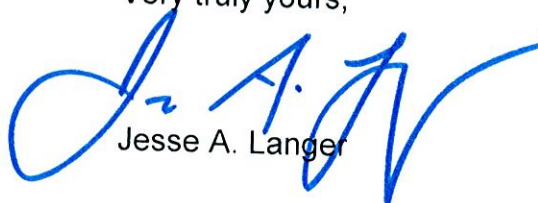
Dear Ms. Roberts:

Enclosed herein please find the following document filed on behalf of the Applicant, T-Mobile Northeast LLC:

- (1) An original and twenty (20) copies of Applicant T-Mobile Northeast LLC's Interrogatories to the Connecticut Siting Council

Please contact me if you have any questions.

Very truly yours,


Jesse A. Langer

JAL:lcc
Enclosures

cc: Service List

**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 MOOSE HILL ROAD IN THE
TOWN OF GUILFORD, CONNECTICUT

DOCKET NO. 417

Date: August 9, 2011

**INTERROGATORY RESPONSES TO CONNECTICUT SITING
COUNCIL FROM APPLICANT T-MOBILE NORTHEAST LLC**

The Applicant, T-Mobile Northeast LLC ("T-Mobile"), submits the following responses to the first set of Pre-Hearing Interrogatories propounded by the Connecticut Siting Council ("Council") in connection with the above-captioned Application.

1. Did T-Mobile receive all of the return receipts for all abutting landowners listed in Application Attachment G? If not, list the abutters that did not receive notice and describe any additional effort to serve notice. When was the abutter list compiled?
- A1 T-Mobile received return receipts from all of the abutting property owners listed in Tab G of the Application for a Certificate of Environmental Compatibility and Public Need ("Application") for the proposed telecommunications facility ("Facility") at Moose Hill Road, Guilford, Connecticut ("Property"), except for the following property owners: (1) the State of Connecticut (Map 69, Lot 13) and (2) Marc J. Knapp (Map 19, Lots 12 and 13). T-Mobile issued certified mailings to these two abutting property owners at both the applicable street address and the last known mailing address on April 8, 2011, and on May 11, 2011. These mailings were returned unclaimed. T-Mobile first compiled the Abutter List on August 13, 2010, and updated that list on March 31, 2011.**
2. Regarding the Site Search Summary, what tower heights were examined at Properties 11, 12, & 13? Were the property owner(s) contacted regarding possible telecommunications use? Is so, were the property owner(s) receptive? Provide a propagation plot for the height examined at each property.

- A2** T-Mobile's radio frequency engineers reviewed the properties identified as 11, 12 and 13 in Tab J of the Application at heights of 107 and 125 feet above grade level. Based upon this assessment, T-Mobile rejected these properties. Initially, T-Mobile rejected these properties because they would not provide suitable coverage to the southeastern portion of the coverage objective. Moreover, these properties are not feasible alternatives to the proposed Facility because they would provide coverage duplicative of the T-Mobile installation on a facility at 723 Leetes Island Road, Branford, which was proposed by Cello Partnership d.b.a. Verizon Wireless ("Verizon") and approved by the Council in Docket 413. Please see attached propagation plots appended hereto as Attachment A.
3. Several of the sites in the Site Search Summary are owned by the Guilford Land Trust. Did the land trust request that T-Mobile investigate these parcels?
- A3** The Guilford Land Conservation Trust ("Trust") did not request that T-Mobile investigate the parcels owned by the Trust. T-Mobile, however, considered these parcels while vetting the area for possible sites for a telecommunications facility that would achieve the coverage objective. These parcels (listed as numbers 8, 9, 10 and 14 on Tab J of the Application) are too far away to achieve the coverage objective.
4. What is T-Mobile's minimum signal level threshold for in-building and in-vehicle use?
- A4** T-Mobile's required lower limit threshold is -84 dBm, which represents T-Mobile's design criteria for 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.
5. Did T-Mobile perform a site drive test or base line drive test for the area? If yes, please provide.
- A5** T-Mobile did not perform a site drive test or base line drive test. T-Mobile, however, performed a network scan of the subject area. The graphic depictions of that test are appended hereto as Attachment B.
6. Regarding the propagation plots in Attachment H, please clarify the plot title on the last plot. What are Sites CTNH802B (on plot), CTNH802C (in title), and CTNH804C?

- A6** CTNH 802B is the telecommunications facility proposed by T-Mobile at Pleasant Point Road, Branford Connecticut. T-Mobile submitted an Application for Certificate of Environmental Compatibility and Public Need, which is currently pending before the Council as Docket 407. The reference to CTNH 802C in the propagation plot title is a typographical error. It should read CTNH 802B. CTNH 804C is the proposed installation by T-Mobile on the telecommunications facility proposed by Verizon at 723 Leetes Island Road, Branford, currently pending before the Council as Docket 413.
7. The topographic maps in the application indicate a series of small ridges on the site property. Is the tower site located on one of these ridges or in the low elevation area below the ridges?
- A7** The proposed Facility is located in the low elevation area below the referenced ridges.
8. Were other locations on the property examined for telecommunications use? If not, why not? If so, why was the current location chosen over the others examined?
- A8** T-Mobile investigated another location on the Property, south of the proposed location. This alternative location was located on a ridge just north of the Amtrak rail line. This site would require tree clearing for the facility compound. The alternative site would also pose more complex construction challenges as the ground is uneven and predominantly rock with rock outcroppings. That location would require significant blasting and a large amount of fill to establish a level compound area with adequate earthen material for grounding the Facility compound. The proposed site would require far less disturbance and would provide additional screening from the existing mature vegetation. Accordingly, T-Mobile determined that the alternative site on the ridge would have more of an environmental impact than the proposed site.
9. Regarding Tab L - confirm the distance to 575 Leetes Island Road (scale on abutters map A-1 indicates different value).
- A9** Tab L of the Application is based upon recent satellite imaging as well as the GIS Mapping made available by the Town of Guilford. According to these resources, the residence located at 575 Leetes Island Road is approximately 535 feet from the proposed Facility. The abutters map (Tab C of the Application) is based upon the Town Assessor's mapping. The Assessor's mapping yields a different result, with 575 Leetes Island Road approximately 665 feet from the proposed Facility.

10. Regarding the visibility analysis, please provide visibility map specific to the Leetes Island area at a scale of 1 inch = 1,500 feet.

A10 Please see magnified viewshed appended hereto as Attachment C.

Respectfully submitted,

T-MOBILE NORTHEAST LLC

By: 

Julie D. Kohler, Esq.
Jesse A. Langer, Esq.
Cohen and Wolf, P.C.

1115 Broad Street
Bridgeport, CT 06604

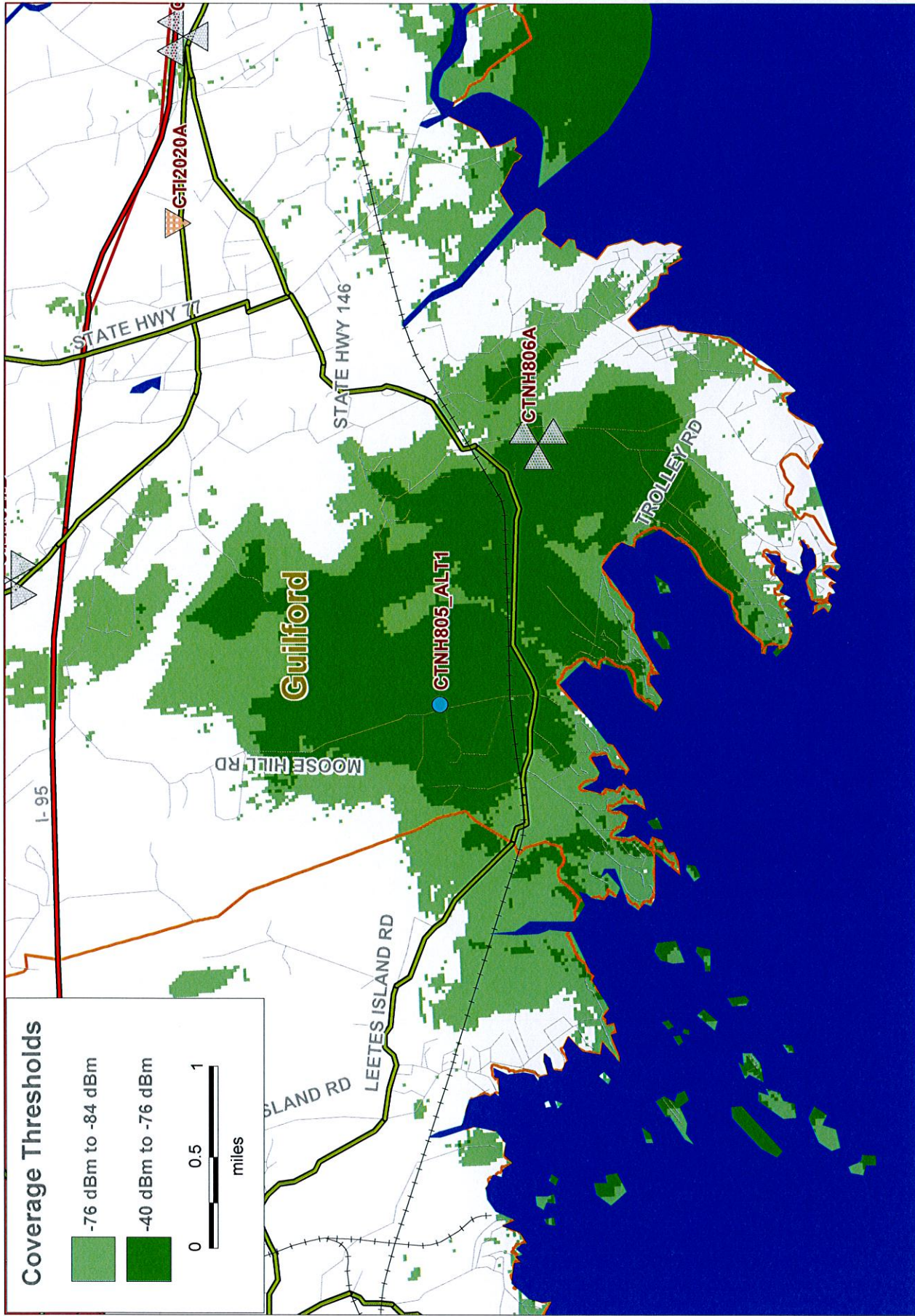
Tel. (203) 368-0211

Fax (203) 394-9901

jkohler@cohenandwolf.com

jlanger@cohenandwolf.com

ATTACHMENT A



Coverage Thresholds

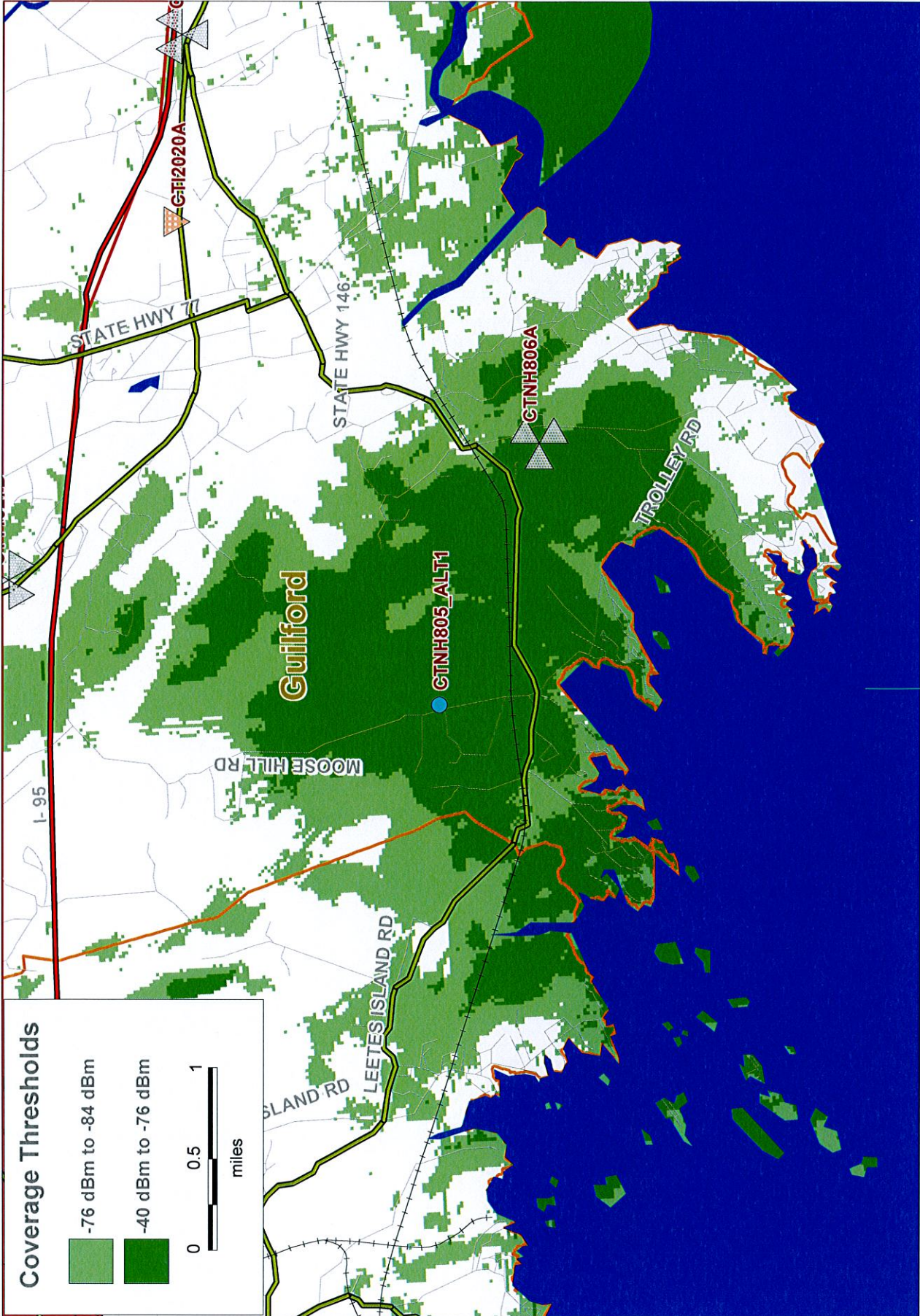
- 76 dBm to -84 dBm
- 40 dBm to -76 dBm



- T-Mobile -

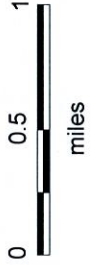
CTNH805 ALT Site 1
 225 Moose hill Rd (Map 66 / 57)
 @ 107 feet

Coverage Threshold Descriptions
 Dark Green: In-Building Coverage (Residential)
 Light Green: In-Vehicle Coverage



Coverage Thresholds

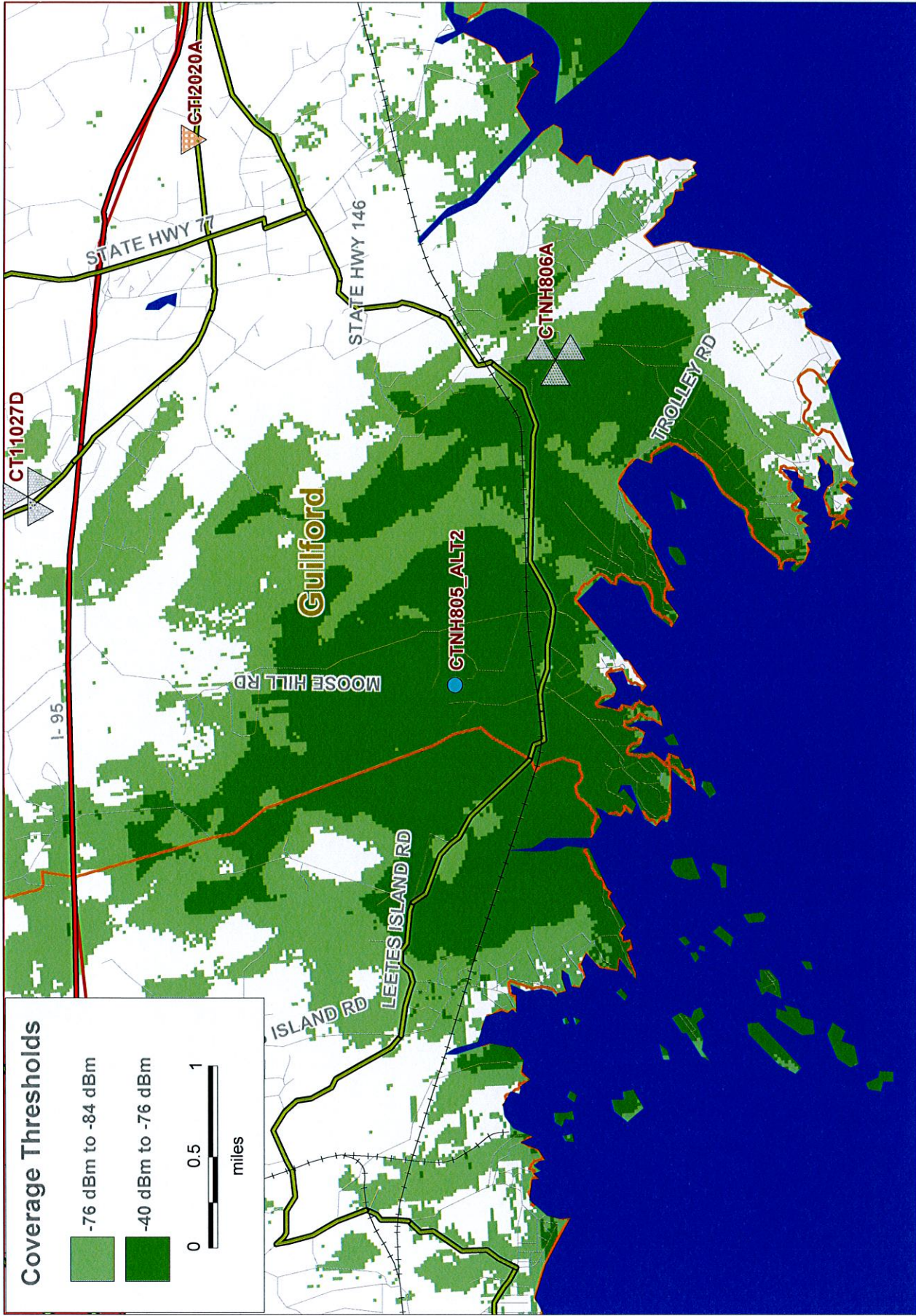
- 76 dBm to -84 dBm
- 40 dBm to -76 dBm



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CTNH805 ALT Site 1
225 Moose Hill Rd (Map 66 / 57)
@ 125 feet

Coverage Threshold Descriptions
Dark Green: In-Building Coverage (Residential)
Light Green: In-Vehicle Coverage



Coverage Thresholds

- 76 dBm to -84 dBm
- 40 dBm to -76 dBm

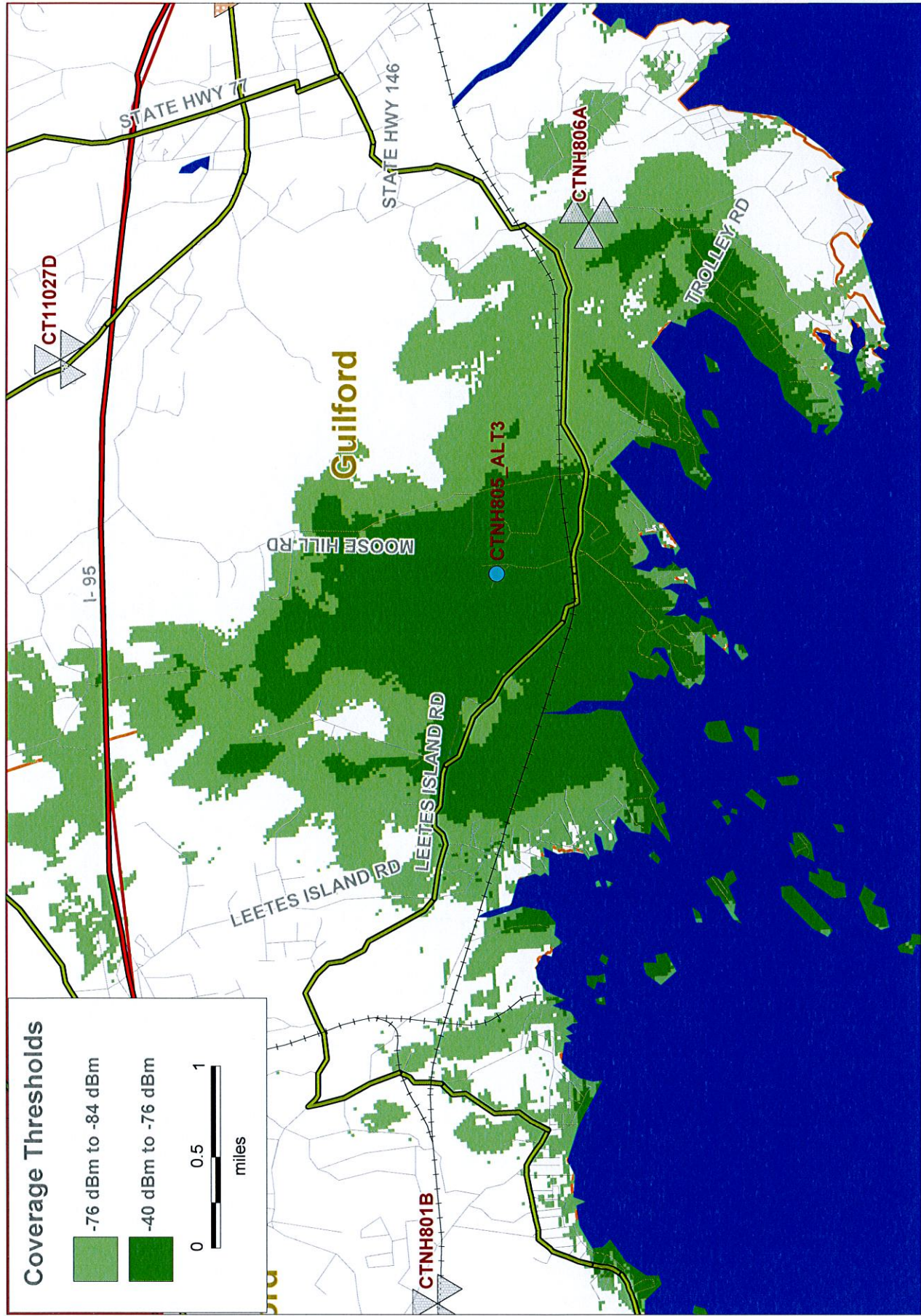


Coverage Threshold Descriptions
 Dark Green: In-Building Coverage (Residential)
 Light Green: In-Vehicle Coverage

CTNH805 ALT Site 2
 204 Dromara Road (Map66 / 017)
 @ 125 feet

- T-Mobile -





Coverage Thresholds

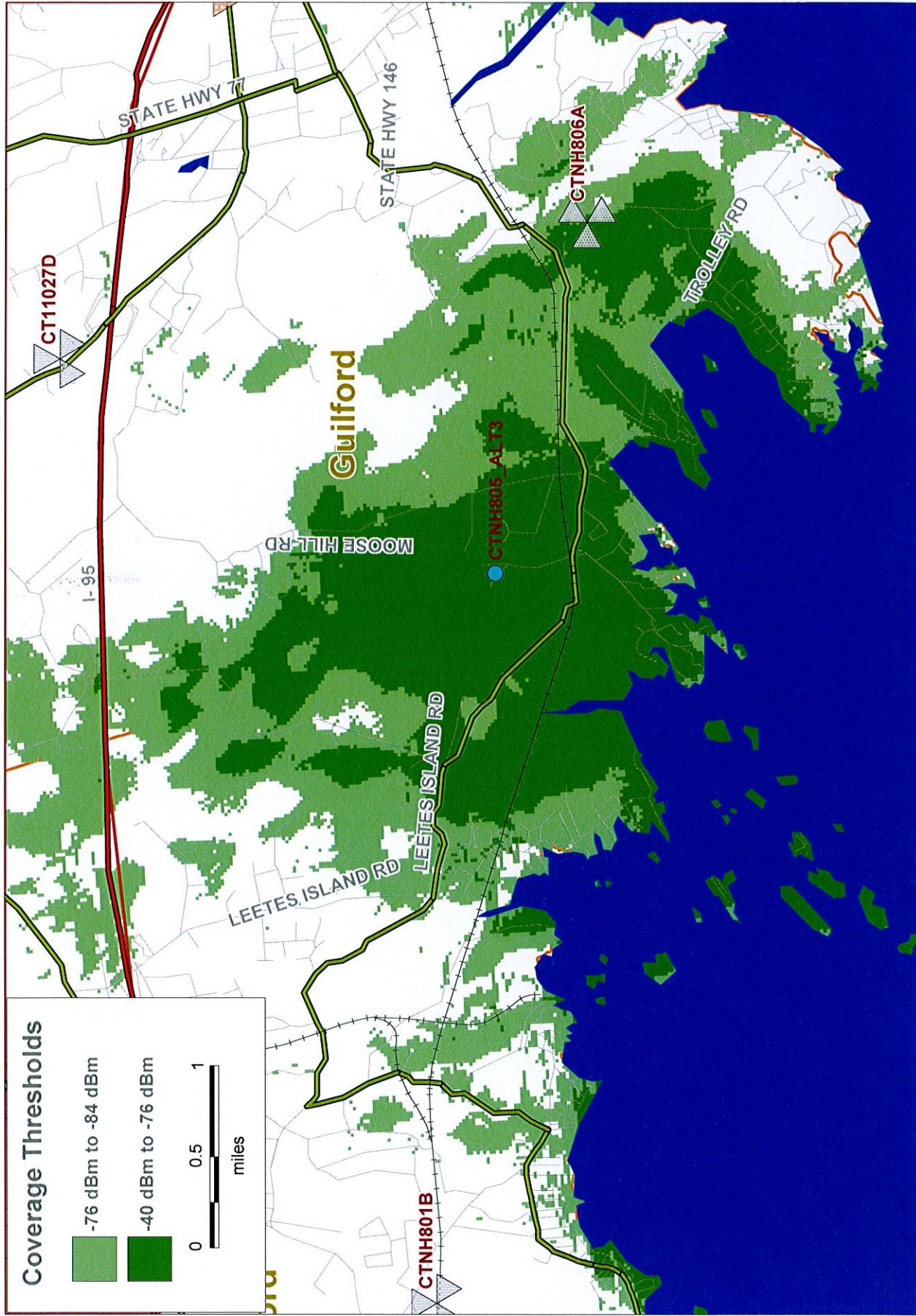
- 76 dBm to -84 dBm
- 40 dBm to -76 dBm



- **T** -Mobile----

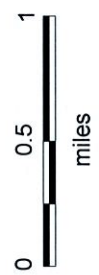
CTNH805 ALT Site 3
 New quarry Road (Map66 / 012)
 @ 107 feet

Coverage Threshold Descriptions
 Dark Green: In-Building Coverage (Residential)
 Light Green: In-Vehicle Coverage



Coverage Thresholds

- 76 dBm to -84 dBm
- 40 dBm to -76 dBm

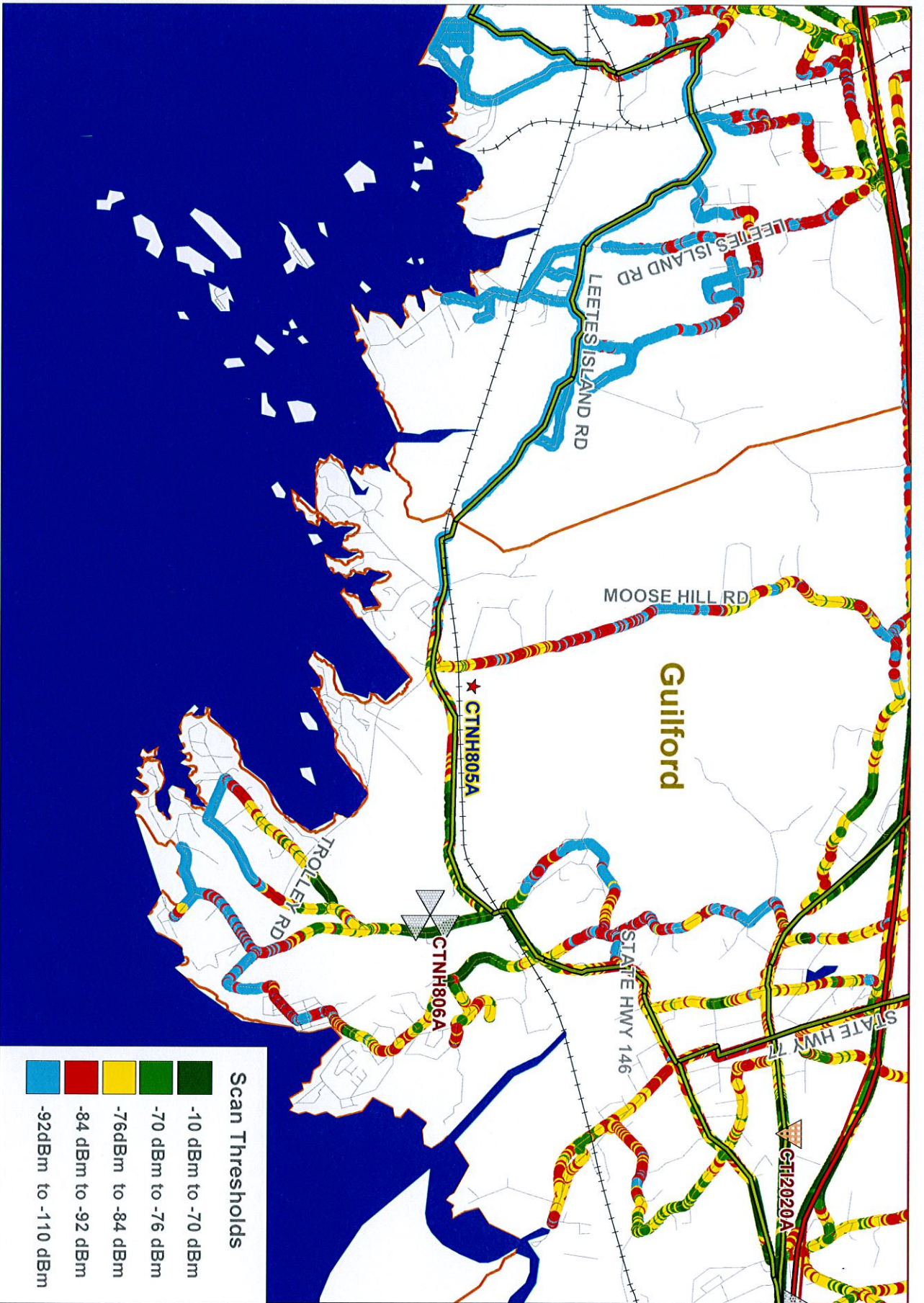


T-Mobile

CTNH805 ALT Site 3
New quarry Road (Map66 / 012)
@ 125 feet

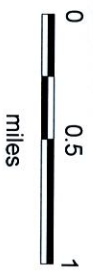
Coverage Threshold Descriptions
Dark Green: In-Building Coverage (Residential)
Light Green: In-Vehicle Coverage

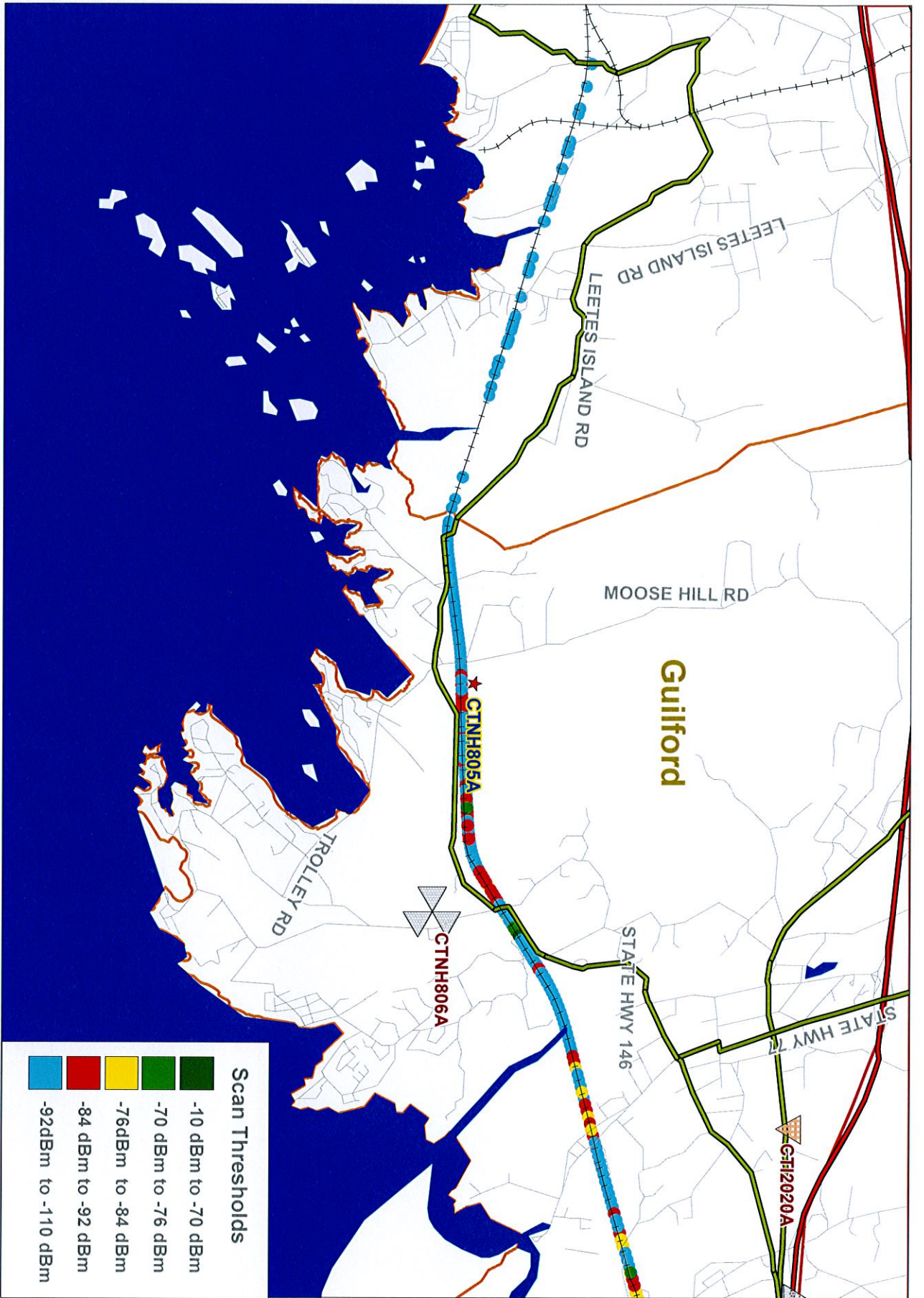
ATTACHMENT B



-T-Mobile---

Existing T-Mobile On Air Coverage
 Network Scan



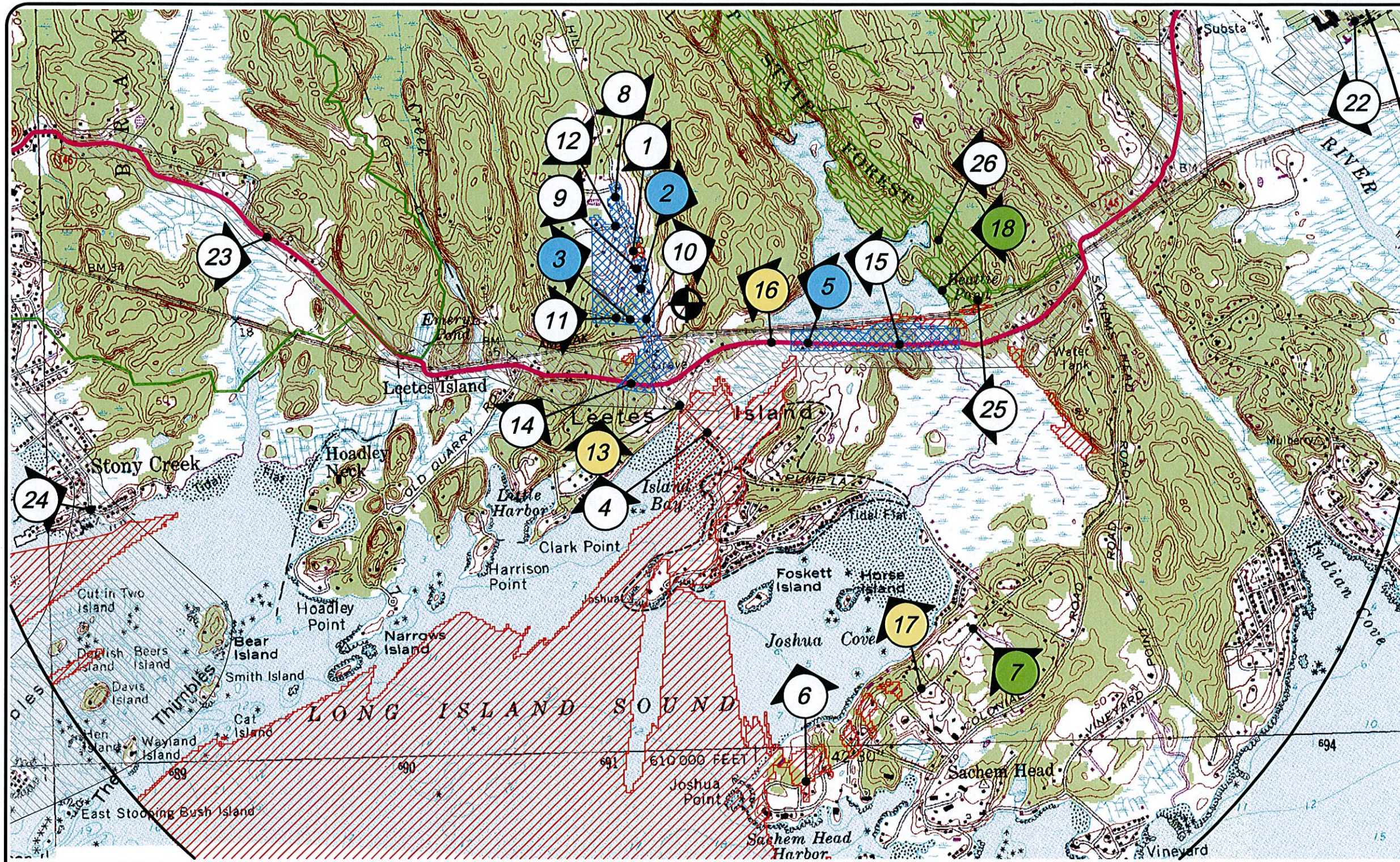


-T-Mobile---

Existing T-mobile On Air Coverage - AMTRAK
 Network Scan



ATTACHMENT C



Revised Tower Height Legend

- VISIBILITY HAS CHANGED FROM YEAR ROUND TO SEASONAL
- VISIBILITY HAS CHANGED FROM SEASONAL TO NON-VISIBLE
- VISIBILITY HAS CHANGED FROM YEAR ROUND TO NON-VISIBLE

Legend

- APPROXIMATE LOCATION OF PROPOSED MONOPOLE
- COMPUTER SIMULATION PHOTOGRAPH LOCATION
- APPROXIMATE LIMIT OF SEASONAL TOWER VISIBILITY
- APPROXIMATE LIMIT OF YEAR ROUND TOWER VISIBILITY

LEETES ISLAND VIEWSHED ANALYSIS MAP
 MOOSE HILL ROAD, GUILFORD, CT
 VISUAL IMPACT ASSESSMENT

PREPARED FOR:
T-MOBILE NORTHEAST LLC
 35 GRIFFIN ROAD
 BLOOMFIELD, CT 06002
 OFFICE: (860)-692-7100

PREPARED BY:
 Drawing Copyright © 2011
CHA
 2130 Silas Deane Highway, Suite 212 - Rocky Hill, CT 06067-2338
 Mails: (860) 257-4557 - www.chacompanies.com
 CHA Project No. 14957-2001-1101

JULY 2011

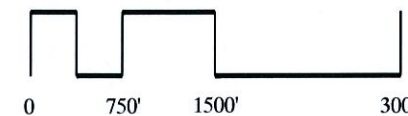


FIGURE VS-02

CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the foregoing was delivered by Electronic Mail and First Class U.S. Mail, postage prepaid, to all parties and interveners of record, as follows:

N/A



Jesse A. Langer, Esc.