

STATE OF CONNECTICUT  
SITING COUNCIL

In Re : DOCKET #421  
T-Mobile Northeast, LLC :  
Application for a Certificate of :  
Environmental Compatibility and :  
Public Need for a telecommunications :  
facility located at :  
128 Edison Road, Trumbull, Connecticut :  
:  
: February 21, 2012

**WRITTEN CROSS EXAMINATION TO APPLICANT REGARDING SUPPLEMENTAL  
PRE-FILED TESTIMONY OF MICHAEL LIBERTINE**

The following Interrogatories are directed to the Applicant by Citizens Against Trumbull Tower. While many of the questions are directed toward Mr. Libertine, some of them may be answered by other members of the T-Mobile panel. For this reason, please identify in each answer which panel member(s) are providing responses to each question.

1. With regard to the view in Photographic Simulation View 8 and View 9 the simulated tower appears much darker in view 8 than it does in view 9. This "fading" of the simulated tower is even more pronounced in view 10 and view 3, why ?
2. What photosimulation software was utilized in simulating the proposed tower?
3. Is there a control or setting that the user of the software identified in the previous Interrogatory which controls the color or relative dark or light nature of the photosimulated tower?
4. If so, what settings were chosen for each photosimulation?
  - a. How were the setting chosen?

5. The photographer of Photosimulation View 9 chose to depict the proposed tower with the house at #20 Merwyn Street blocking the lower half of the tower. Why?

6. The photograph for 20 Merwyn Street (View 9) and all of the houses were taken from the front of the house while many homeowners will have a view from the side, the back porch, kitchen and bedroom windows. For example, attached hereto as Ex. 1 shows a view of the existing tower (and thus the approximate location of the proposed tower) from the side of 20 Merwyn Street. Would that have not been a more fair and accurate representation of the full visual impact at that home location?

7. In View 9 depicting the existing lattice work tower, it is true that the photograph could have been taken a few feet to the right where the trees would have obscured the existing lattice work tower completely or a few feet to the left where the house would have blocked a larger portion of the existing lattice work tower. Was this not done to show more of the existing tower and less of the proposed tower?

8. In View 4 did the photographer intend to make the telephone poles and street signage the most prominent feature of the View at that location?

9. What assumptions for tree height were used in developing the visual impact study map?

10. Upon what factual basis (what data was used) was that tree height determined?

11. Was tree height considered or inputted into the modeling software for the coverage modeling performed by T-Mobile for its coverage objectives?

12. What tree height was used in the coverage modeling for T-Mobile's coverage map and why?

13. Some of the homes in the study area for the visual impact are built above street level. All the photosims were shot at street level. What effort is made to depict the view more accurately from the level of the homeowner on the ground and living floors of the homes above street level?

Respectfully Submitted,

Citizens Against Trumbull Tower,

By 

Keith R. Ainsworth, Esq.

Evans Feldman & Ainsworth, L.L.C. #101240

261 Bradley Street

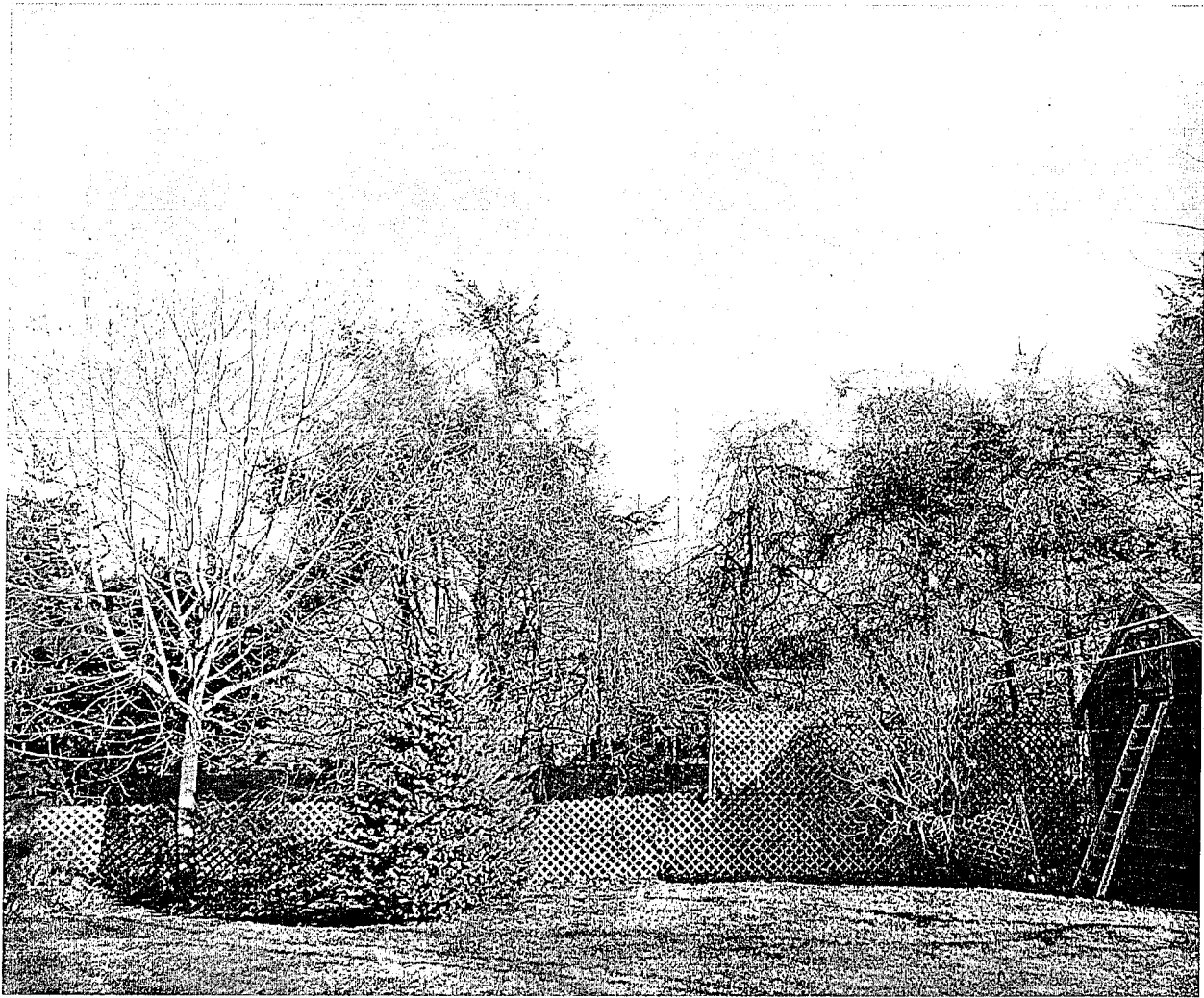
P.O. Box 1694

New Haven, CT 06507-1694

(203)772-4900

(203)782-1356 fax

[krainsworth@snet.net](mailto:krainsworth@snet.net)




CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was electronically filed and deposited in the United States mail, first-class, postage pre-paid this 21st day of February, 2012 and addressed to:

Ms. Linda Roberts, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig, 15 copies, plus 1 electronic) (US Mail/electronic).

T-Mobile Northeast, LLC c/o Julie D. Kohler, Esq., Jesse A. Langer, Esq. Cohen and Wolf, P.C. 1115 Broad Street, Bridgeport, CT 06604 (203) 368-0211, (203) 394-9901 fax [jkohler@cohenandwolf.com](mailto:jkohler@cohenandwolf.com) , [jlanger@cohenandwolf.com](mailto:jlanger@cohenandwolf.com) (electronic and US Mail)

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Keith R. Ainsworth, Esq.