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March 2, 2012

Via E-Mail and First Class U.S. Mail

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Virginia King
Message Center Management, Inc.
40 Woodland Street
Hartford, CT 06105

Re: Connecticut Siting Council Docket No. 425; Message Center Management application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance, and operation of a replacement telecommunications facility located at 4 Dittmar Road, Redding, Connecticut

Dear Attorneys Fisher, Laub, Kohler, and Langer, and Ms. King:

The Town of Redding requests your responses to the enclosed interrogatories no later than 5:00 p.m. on Tuesday, March 20, 2012.

I certify that a copy of the foregoing has been mailed this date to all parties and intervenors of record.

Sincerely,

By: 
Attorney For Town of Redding
Brad N. Mondschein
bmondschein@pullcom.com

**STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL**

**Message Center Management application for a
Certificate of Environmental Compatibility and
Public Need for the construction, maintenance,
and operation of a replacement telecommunications
facility located at 4 Dittmar Road, Redding, Connecticut**

Docket No. 425

March 2, 2012

TOWN OF REDDING'S FIRST SET OF INTERROGATORIES

For Message Center Management (MCM):

MCM-1. Regarding noise related to the project:

- a. Provide the existing baseline and peak decibel levels of the current installation, including but not limited to the air conditioning compressors, as measured at the perimeter property line of each abutting property owner. The measurement should be taken at the point along the property line closest to the current installation.
- b. Provide the projected baseline and peak decibel levels of the new installation, including but not limited to the air conditioning compressors, at the points measured in response to MCM-1.a.
 - i. Provide an explanation as to the methodology used to project the new decibel levels and the assumptions made with respect to noise abatement that will be installed at the new installation.
 - ii. Provide a detailed description of available options for noise abatement, including but not limited to the use of sound insulation on the air conditioning compressors and the feasibility of sound-insulating the entire equipment compound.
 - iii. Confirm that MCM consents to all assumptions relating to projected noise abatement listed in response to MCM-1.b.i being incorporated into the final order of the Siting Council as a condition to the siting of the new installation.

MCM-2. Confirm that the replacement monopole will be in the same foundation area as the existing guyed tower.

- a. Provide a depiction of the current guyed tower with the projected new installation being overlaid to demonstrate the proximity of the new installation to the existing guyed tower.
- b. Provide a depiction of the current cabinets and shelters that are on the Premises for use by the wireless telecommunications companies with facilities on the tower and overlay the projected placement of cabinets and shelters expected to be on the Premises after the installation of the replacement tower.
- c. Provide a depiction of the current fencing, installed noise abatement features and visual impact reducing features at the guyed tower and overlay the projected fencing, installed noise abatement features and visual impact reducing features at the new installation.
- d. Confirm that MCM consents to all assumptions relating to projected fencing, noise abatement and visual impact reducing features listed in response to MCM-2.a through MCM-2.c. being incorporated into the final order of the Siting Council as a condition to the siting of the new installation.

MCM-3. Confirm that the proposed monopine tower is the same model and will be installed by the same company as the tower shown by MCM in Windsor, Connecticut, to the abutting property owners.

MCM-4. Regarding expansion of the monopole:

- a. Confirm that before expanding the monopole beyond 127 feet, MCM will file either for a Certificate or a Petition with the Siting Council for approval of such expansion.
- b. Provide a detailed description of what circumstances would cause MCM to expand the monopole beyond 127 feet.
- c. If the tower is expandable beyond 147 feet, then provide a detailed description of what circumstances would cause MCM to expand the monopole beyond 147 feet.
- d. Confirm that MCM consents to a maximum height of 147 feet being incorporated into the final order of the Siting Council as a condition to the siting of the new installation.

- MCM-5. Confirm that before filing any exempt modification filings or tower sharing filings with the Siting Council with respect to the new installation, MCM will provide notice of such filing to the Town of Redding.
- MCM-6. Refer to MCM's Application for Certificate of Public Convenience and Necessity (Application), Section VIII, p. 17.
- a. There, in reference to abutting property owners' requests, it states that "MCM's Application largely incorporates these requests...". Provide a list of which requests were incorporated into the Application.
 - b. There, in reference to abutting property owners' requests, it states that "MCM's Application largely incorporates these requests...". Provide a list of which requests were not incorporated into the Application and why MCM chose not to incorporate them.
- MCM-7. Refer to MCM's Application, Section VIII, p. 18. There, it refers to "other details as requested by abutting property owners...". Provide a list of these "other details" and explain in detail the actions MCM plans to take regarding abutting property owners.
- MCM-8. Provide a list of backup electric generation equipment currently installed at the tower or projected to be installed at the tower and whether it is expected that any of the current or future tenants of the tower are expected to use the backup electric generation while new or replacement electric service is installed at the tower. If backup electric generation is expected to be required, then provide the expected timeframe for its use.
- MCM-9. Regarding safety issues:
- a. Explain how MCM expects to address the fall zone of the replacement tower extending on to the land of abutting property owners.
 - b. Provide any engineering studies or testing data relating to how wind affects a monopine tower, including what wind velocities cause failure of the tower.
 - c. Provide any engineering studies or testing data relating to the breakpoints of a monopine tower, including a description of how the tower will fall if it breaks.
- MCM-10. Regarding visual screening of the project:

- a. Provide a detailed description of MCM's plan for installing screening, whether vegetative or other, along the perimeter property line of each abutting property owner.
- b. If abutting property owners grant MCM access onto their land, then would MCM install screening on abutters' property in order to prevent the tower property owner, Mr. Paradise, from removing the screening?

MCM-11. When did T-Mobile first sign a lease for locating an antenna at the proposed tower? Provide a copy of the lease. Explain what caused the delay in placing antennae on the guyed tower or in MCM erecting a new tower from the date of the lease until the current Certificate filing.

For T-Mobile:

- TM-1. Explain whether T-Mobile customers using cell or data services in the proximity of the current guyed tower can obtain T-Mobile Services. If yes, explain why T-Mobile is planning to install an antenna in the location of the proposed tower.
- TM-2. Explain why T-Mobile has not sought to locate an antennae on the current guyed tower in a previous timeframe. Explain what has caused T-Mobile to install antennae at the proposed location at this time.
- TM-3. Provide a list of backup electric generation equipment projected to be installed at the tower and whether T-Mobile expects to use the backup electric generation while new or replacement electric service is installed at the tower. If backup electric generation is expected to be required, provide the expected timeframe for its use.
- TM-4. When did T-Mobile first sign a lease for locating an antenna at the proposed tower? Provide a copy of the lease. Explain what caused the delay in placing antennae on the guyed tower.