CUDDY & FEDER LLP

445 Hamilton Avenue, 14th Floor
White Plains, New York 10601
Tel 914.761.1300 Fax 914.761.5372
www.cuddyfeder.com

September 4, 2012

VIA EMAIL & FEDEX
Hon. Robert Stein, Chairman
and Members of the Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: New Cingular Wireless PCS, LLC (AT&T)
Application for Certificate of Environmental Compatibility and Public Need
Tolland Turnpike & Old South Willington Road, Town of Willington, Connecticut
Application to the State of Connecticut Siting Council

Dear Chairman Stein and Members of the Siting Council:

On behalf of New Cingular Wireless PCS, LLC (AT&T) and in connection with the above referenced Certificate Application, we respectfully enclose the original and twenty (20) copies of the Applicant's Responses to Siting Council Interrogatories Set I.

Should the Siting Council or Staff have any questions regarding this matter, please do not hesitate to contact us.

Very truly yours,

Daniel M. Laub
Enclosures

cc: Michele Briggs, AT&T
David Vivian, SAI
Michael Libertine, APT
Dean Gustafson, APT
Anthony Wells, C Squared Systems
Paul Lusitani, CHA
Christopher B. Fisher, Esq.

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:
APPLICATION OF NEW CINGULAR WIRELESS, LLC (AT&T) FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION, MAINTENANCE AND OPERATION OF A TELECOMMUNICATIONS TOWER FACILITY LOCATED IN WILLINGTON, CONNECTICUT

DOCKET NO. 429
September 4, 2012

RESPONSES TO SITING COUNCIL'S INTERROGATORIES SET I

Q1. Of the letters sent to abutting property owners, how many certified mail receipts did AT&T receive? If any receipts were not returned, which owners did not receive their notice? Did AT&T make additional attempts to contact those property owners?

A1. *Of the 33 letters sent, 19 return receipts were received. An additional 9 deliveries were confirmed through the United States Postal Service Website Track and Confirm tool. Five letters resending the notices were then sent by first-class mail to Thomas Posik, Steven Santo Cristo, Thomas & Michael Ernst, Arthur Lu & Russell Craven, and Mary Krivanek.*

Please note, however, that review of the Abutters map included in Application Attachment 4(A) identifies parcel 23-54 as belonging to Mary Krivanec. In fact the latest available information through the Willington Tax Assessor's office indicates that the parcel now belongs to Tara Ace Realty LLC. A notice letter was sent to Tara Ace Realty prior to the Application being filed and a mail receipt was returned. Both the mail receipt and the property listing report of the Willington Tax Assessor are included as Attachment A hereto.

Q2. When was the search ring for this site established? Where was the approximate center of the search ring? What was the approximate diameter of the search ring?

A2. *The search ring was issued on December 17, 2008. The center of the search area was at 41-51-59.1 N 72-16-26.4 W. The original search area was approximately 1 mile in diameter.*

Q3. How did AT&T become aware of the need for a facility in this area?

A3. *The need for the facility was determined based on coverage analysis of the area and customer complaints.*

Q4. Has AT&T received any indications that the Town of Willington would be interested in placing antennas on the proposed tower?

A4. *AT&T has not received any indications of interest regarding municipal use of the tower to date.*

Q5. Quantify the amounts of cut and fill that would be required to develop a facility at the Candidate A site. At the Candidate B site.

A5. *The amount of cut and fill for the Candidate A (Tolland Turnpike) site is approximately 111 cubic yards of cut and 151 cubic yards of fill. The Candidate B (South Willington Road) site is anticipated to require 590 cubic yards of cut and 286 cubic yards of fill.*

Q6. Would any blasting be required for either site?

A6. *The presence of ledge is not anticipated but will be confirmed upon completion of a geotechnical investigation. If ledge is encountered, removal by mechanical means would first be attempted. If mechanical removal methods are unsuccessful, blasting could be utilized as required to remove the ledge.*

Q7. Would the proposed facility comply with recommended guidelines of the United States Fish and Wildlife Service for minimizing the potential for telecommunications towers to impact bird species?

A7. *Yes. Both Candidate Sites would comply with the USFWS guidelines.*

Q8. Would the proposed facility impact on Important Bird Area identified by the Audubon Society?

A8. *No, neither proposed candidate is located within an "Important Bird Area" (IBA) as designated by the National Audubon Society. The nearest IBA to either Candidate is the Trinity College Field Station, located in Ashford approximately 5.2 miles to the east.*

Q9. What are the frequencies AT&T is licensed to use in the area covered from the proposed facility?

A9. *AT&T's licensed frequencies in the proposed coverage area are as follows:*

Cellular:

KNKA239	*Cellular B-Band*

PCS:

KNLG441	*D-Block*
KNLG442	*E-Block*
WPSL626	*A3 Block*
WPTF536	*C1 Block*

700 MHz:

WPWV366	*Lower C*
WQIZ617	*Lower E*
WQJU451	*Lower B*

Q10. Identify the adjacent sites with which the proposed facility would hand off signals. Include addresses of these sites.

A10. *The adjacent sites are as follows:*

Site Name	Address	Town	Latitude	Longitude	Antenna Centerline (feet)	Distance from Tolland Turnpike (miles)	Distance from Old South Willington (miles)
CT1037	5 Barbara Road	Tolland	41.8733	-72.3383	151	3.55	3.35
CT1077	1298 STORRS ROAD	STORRS	41.8140	-72.2594	185	4.29	3.49
CT1105	426 RIVER ROAD	WILLINGTON	41.8907	-72.2894	113	1.47	2.04
CT1200	1725 STAFFORD ROAD	STORRS MANSFIELD	41.8359	-72.3078	150	3.39	2.56
CT1250	99 KNOWLTON HILL ROAD	ASHFORD	41.8407	-72.2075	180	3.99	3.79
CT5701	20 SELES ROAD	ASHFORD	41.8634	-72.1828	140	4.53	4.72
CT5822	497 MIDDLE TURNPIKE	Mansfield	41.8227	-72.2863	120	3.76	2.88
Tolland Tpke	Tolland Turnpike	WILLINGTON	41.8757	72.2694	157	N/A	0.88
OldS. Willington	Old South Willington Road	WILLINGTON	41.8634	72.2745	187	0.88	N/A

Q11. What is the signal strength for which AT&T designs its system? For in-vehicle coverage? For in-building coverage? Does this signal strength differ according to the different frequencies AT&T is licensed to use?

A11. *As shown on the plots provided in the Application, -74 dBm is AT&T's design criteria for in-building coverage and -82 dBm is AT&T's design criteria for in-car coverage. The signal strength design does not change among the different frequencies.*

Q12. What is the existing signal strength in those areas AT&T is seeking to cover from this facility? At what frequencies?

A12. *The existing signal strength in the areas that would be covered by one of the proposed Candidate sites range from -82 dBm down to less than -100 dBm and does not constitute acceptable coverage for the most part.*

Q13. Does AT&T have any statistics on dropped calls in the vicinity of the proposed facility? If so, what do they indicate? Does AT&T have any other indicators of substandard service in this area?

A13. *The dropped call rate in areas near the area of need is 0.62%. However, while dropped calls can be an excellent representation of how effectively existing coverage is being*

utilized, in an area of very poor coverage such as here dropped call statistics are not a reliable indicator of an inadequate network for various reasons:

• Many users become familiar with areas of poor coverage or no service and stop making calls in these areas;

• Since mobile communication is a two-way connection, if a cell site cannot hear a mobile unit, it will not register as a failure if that link is problematic; and

• Dropped calls are only a partial indicator of quality - sometimes you can hold a call but the person on the other end cannot hear you.

AT&T currently experiences spotty and unreliable coverage in this area which is not acceptable for users of the AT&T network. Overall, reliable coverage relates directly to the customer experience and AT&T customers are highly mobile, making calls from their vehicles, their places of business and their homes. In addition, many customers are now substituting cell phones for their landline phone service as their only means of voice communications. To properly serve these customers, the service must be reliable, particularly since the service carries 911 calls.

Q14. What are the distances that would be covered from the respective Candidate sites along the State routes 74 and 320?

A14. *The distances that would be covered from the respective Candidate sites along the State routes 74 and 320 are as follows:*

Candidate A (Tolland Turnpike)

Route 74: 1.46 miles

Route 320: 1.93 miles

Candidate B (Old South Willington Road)

Route 74: 0.86 miles

Route 320: 1.93 miles

Q15. What are the total areas that AT&T would be able to cover from the proposed facility at the Candidate A site at its different frequencies? At the Candidate B site?

A15. *The areas of coverage are as follows:*

		Site A Tolland Turnpike, Willington, CT at 157 feet AGL	Site B Old South Willington Road, Willington, CT at 187 feet AGL
Area Covered (mi ²):	"In-Building" (-74 dBm)	7.49	6.22
	"In-Vehicle" (-82 dBm)	6.11	4.88

Q16. What is the lowest feasible height at which AT&T's antennas could fulfill the coverage objectives from the proposed facility at the Candidate A site? At the Candidate B site?

A16. *The minimum feasible height for the Candidate A facility is 157 feet centerline AGL. Lower heights open up a gap along Route 74 east of Route 320 which at 157 feet*

centerline AGL is an area of marginal in-vehicle coverage. Of note, the facility at this location was originally designed to provide coverage at 187 feet centerline AGL and was subsequently reduced to the very minimum of 157 feet centerline AGL as a result of SHPO consultation.

The minimum feasible height for the Candidate B facility is 187 feet centerline AGL. Even at that proposed height the Site B candidate leaves a gap in coverage along Route 74 to the west of Route 320. Due to terrain and location, the height of the Site B facility would have to be well above 200' in order to provide coverage in that area. Given the associated impacts with such a facility, including marking and lighting for air navigation safety, the proposed height was deemed the minimum acceptable.

Q17. What kind of fuel would the backup generator use? How many hours of service would the generator be able to provide before it needs to be refueled?

A17. *AT&T's proposed backup generator is a diesel generator. AT&T will also have a battery backup required to prevent the facility from experiencing a "re-boot" condition during the generator start-up delay period. The typical total run time of the backup generator to be used is approximately 48 hours.*

Q18. How many trees with a diameter at breast height of six inches or greater would be removed to develop the facility at the Candidate A Site?

A18. *It is estimated that 55 trees with a diameter of 6 inches or greater at breast height would have to be removed.*

CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and twenty copies of the foregoing was sent electronically and by overnight mail to the Connecticut Siting Council.

Dated: September 4, 2012

Daniel M. Laub

cc: Michele Briggs, AT&T
David Vivian, SAI
Michael Libertine, APT
Dean Gustafson, APT
Anthony Wells, C Squared Systems
Paul Lusitani, CHA
Christopher B. Fisher, Esq.

ATTACHMENT A

Town of Willington, CT
Property Listing Report

Parcel ID 23/054-00

Account 00115800

Property Information

Owner	TARA ACE REALTY LLC
Address	WILLINGTON HILL RD
Mailing Address	BOX 535 WILLINGTON CT 06279
Land Use	1300 Vacant Land
Land Class	R
Vision ID	3569

Fire District	
Census Tract	U
Neighborhood	101
Zoning Code	R80
Acreage	17.77
Utilities	
Lot Setting/Desc	Low

Photo

Sketch

Not Available

Not Available

Construction Details

Year Built	
Year Improved	
Stories	
Building Style	
Building Use	
Building Condition	
Total Rooms	

Bedrooms	
Full Bathrooms	
Half Bathrooms	
Bath Style	
Kitchen Style	
Roof Style	
Roof Cover	

Exterior Walls	
Interior Walls	
Floors:	
Heating Type	
Heating Fuel	
AC Type	
Gross Bldg Area	
Total Living Area	0

Current as of March 2012

Town of Willington, CT
Property Listing Report

Parcel ID 23/054-00 Account 00115800

Valuation Summary

(Assessed value = 70% of Appraised Value)

Item	Appraised	Assessed
Buildings	0	0
Outbuildings	0	0
Improvements	0	0
Extras	0	0
Land	124790	77270
Total	124790	77270

Outbuilding and Extra Items

Type	Description

Sub Areas

Subarea Type	Gross Area (sq ft)	Living Area (sq ft)
	Total Area	

Sales History

Owner of Record	Book/ Page	Sale Date	Sale Price
TARA ACE REALTY LLC	196/ 752	7/22/2011	92500
KRIVANEC MARY B	48/ 60	12/30/1967	
DONALDSON KENNETH E & HARRIETTE H			0

2. Article Number

7196 9008 9040 0952 5802

3. Service Type **CERTIFIED MAIL™**

4. Restricted Delivery? *(Extra Fee)* ☐ Yes

1. Article Addressed to:

Tara Ace Realty LLC
PO Box 535
Willington, CT 06279

COMPLETE THIS SECTION ON DELIVERY

A. Received by (Please Print Clearly) J Becker

B. Date of Delivery 7-20-12

C. Signature

X LBECKER ☑ Agent ☐ Addressee

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

Reference Information

1844-2045

S. Pearson

[redacted]

PS Form 3811, January 2005 Domestic Return Receipt