

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
 APPLICATION OF NEW CINGULAR : DOCKET NO. 442
 WIRELESS, PCS LLC (AT&T) FOR A :
 CERTIFICATE OF ENVIRONMENTAL :
 COMPATIBILITY AND PUBLIC NEED FOR :
 THE CONSTRUCTION, MAINTENANCE AND :
 OPERATION OF A TELECOMMUNICATIONS :
 FACILITY AT 284 NEW CANAAN AVENUE, :
 NORWALK, CONNECTICUT : JANUARY 21, 2014

**POST-HEARING BRIEF OF INTERVENOR
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS**

On September 20, 2013, New Cingular Wireless PCS, LLC (“AT&T”) submitted an application (“Application”) to the Connecticut Siting Council (“Council”) for a certificate of environmental compatibility and public need (“Certificate”) for the construction, maintenance and operation of a wireless telecommunication facility at a State of Connecticut Armory Site located at 284 New Canaan Road (Route 123) in Norwalk, Connecticut (the “Property”). The proposed facility consists of two 140-foot stealth monopole towers and associated equipment shelters located within a 50-foot by 80-foot fenced compound. All antennas would be internally-mounted and each monopole would be painted brown. AT&T intends to install antennas at the 117-foot, 127-foot and 137-foot levels on the northerly monopole tower. Space is available below the AT&T antennas on the northerly monopole and on the southerly monopole for other wireless carriers. (Applicant’s Exhibit (“Exh.”) 1).

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) has identified a need for improved wireless service along portions of Routes 15 and 123 and local roads, and in residential areas in

northwest Norwalk and southeast New Canaan. (Cellco Exh. 2, Resp. 1). Cellco's Radio Frequency (RF) engineers have determined that its wireless service need in this area can be satisfied by installing three (3) 2100 MHz antennas at the 117-foot level and three (3) 700 MHz antennas at the 107-foot level on the southerly monopole tower. (Cellco 2, Resp. 3). Consequently, on November 4, 2013, Cellco filed a petition to intervene in the Docket No. 442 Application and hearing process ("Petition") (Cellco 1). The Council granted Cellco intervenor status in this proceeding on November 14, 2013.

The Council conducted an evidentiary and public hearing on the Application on December 19, 2013. (12/19/13 Hearing Transcript ("Tr."), p. 4). This post-hearing brief is filed on behalf of Cellco pursuant to Section 16-50j-31 of the Regulations of Connecticut State Agencies ("R.C.S.A.") and the Council's directives. (12/19/13 Tr., p. 129).

Cellco's Need and Proposed Facility Installation

The proposed Cellco wireless facility at the Property will provide both coverage and capacity relief to Cellco's network in southeast New Canaan and northwest Norwalk. Cellco currently experiences gaps in service along portions of Routes 15 and 123, along local roads and in certain residential neighborhoods in the area near the Property. (Cellco 2, Q. 1). Service from Cellco's existing cell sites in New Canaan, Norwalk, Wilton and Darien cannot provide the coverage or capacity relief to these areas. (Cellco Exh. 2, Q. 6 and 7). The Docket No. 442 record contains ample written evidence and testimony that Cellco's antennas at the 117-foot and 107-foot levels on the southerly monopole tower would provide quality wireless service and satisfy a significant portion of Cellco's coverage and capacity objective in the area. (Cellco Exh. 2).

Cellco's radio equipment and a diesel-fueled back-up generator would be located inside a 12' x 30' shelter located in the southerly portion of the facility compound. (Cellco Exh. 2, Q. 6 and 9).

Unipole Tower Design and Cellco's Antenna Configuration

When Cellco filed its Petition to Intervene in this proceeding, it was aware of the tower design restrictions imposed on AT&T by the Connecticut State Historic Preservation Office and designed an antenna configuration to work within those limits. (AT&T 1, pp. 3, 15-16). Cellco intends to install three (3) 2100 MHz antennas at the 117-foot level and three (3) 700 MHz antennas at the 107-foot level on the southerly monopole tower. This configuration will impact Cellco's network performance by reducing the coverage footprint from this location.


The mandated tower design will require the diameter of the upper portion of the southerly monopole to be a minimum of 42 inches to accommodate the antennas and antenna cables Cellco intends to install. (Tr., p. 75). The monopole design will not permit Cellco to install remote radio heads and/or tower mounted amplifiers at this site. This equipment needs to be installed close to the antennas. (Cellco 2, Q. 4; Tr., pp. 75-77).

The horizontal distance between the two monopole towers described in this filing is approximately 65 feet. (AT&T 1, Tab 3; Tr., p. 88). This is the minimum required to avoid antenna pattern degradation between the AT&T and Cellco antennas. (Tr., pp. 88-90). Cellco would not object if, in an effort to increase the distance between on-site wetland areas and ground disturbance associated with construction of the AT&T facility compound, the southerly limits of the facility compound were to shift to the north. (Tr., pp. 89-90).

Conclusion

The evidence in the Docket No. 442 record supports Cellco's need for a new facility in southeast New Canaan and northwest Norwalk area. The installation of Cellco antennas on the southerly monopole tower at the Property will satisfy Cellco's coverage objectives in the area. The significant benefits realized in satisfying the needs for improved service in this area outweighs the minimal additional environmental impact associated with the proposed tower. Cellco, therefore, respectfully requests that the Council approve the Docket No. 442 Application, and issue a Certificate for this Facility accordingly.

Respectfully submitted,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

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CERTIFICATION

I hereby certify that on this 21st day of January, 2014, a copy of the foregoing was sent,
postage prepaid, to the following parties and intervenors:

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