

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

NEW CINGULAR WIRELESS PCS, LLC
APPLICATION FOR CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY
AND PUBLIC NEED FOR A
TELECOMMUNICATIONS TOWER FACILITY ON
STATE OWNED PROPERTY AT
284 NEW CANAAN AVENUE, NORWALK, CT ON
THE BORDER WITH NEW CANAAN, CT

DOCKET NO. 442

MAY 9, 2014

NEW CINGULAR WIRELESS PCS, LLC ("AT&T")
POST HEARING BRIEF

Respectfully Submitted,

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PRELIMINARY STATEMENT

New Cingular Wireless PCS, LLC (“AT&T”), by its attorneys Cuddy & Feder LLP, respectfully submits this post-hearing brief in support of its application for a Certificate of Environmental Compatibility and Public Need (“Certificate”) in Docket No. 442. AT&T’s Application addresses the long standing public need for a new tower facility in this part of Connecticut so that wireless carriers may provide reliable services to residents, visitors and travelers along State Routes 123 and 15 (Merritt Parkway) and residential neighborhoods in the City of Norwalk and Town of New Canaan. The public need for reliable service and new tower infrastructure in this part of the state is uncontroverted. AT&T’s Application in Docket 442 proposes the construction of a tower facility on a small portion of State property at 284 New Canaan Avenue which is otherwise used as a military installation by the Connecticut National Guard (the “Armory” or “Site”). The Applicant respectfully submits that the proposed location is ideal in this area of Fairfield County, there have been no significant adverse environmental effects identified with the project and it fully meets the criteria in Section 16-50p of the General Statutes for issuance of a Certificate. Principally, the question presented for the Council in this Docket is how to best accommodate the need for a tower that meets AT&T and other carrier collocation requirements in accordance with state policy and the State Historic Preservation Officer’s legally binding determination that a monopole tower with platforms cannot be constructed at the Site.

STATEMENT OF FACTS

A. AT&T’s Service Objectives & Site Search

AT&T’s radiofrequency (“RF”) engineers establish site search areas where new wireless facilities are needed to address the public’s inability to obtain reliable service in its wireless network. AT&T and other carriers experience gaps in coverage in Norwalk and New Canaan

along State Routes 123 and 15 (Merritt Parkway) and residential neighborhoods in the area. AT&T Ex. 1. pp. 9-11., Tab 1. AT&T's RF engineers established a site search area about 15 years ago based on this documented gap in coverage. AT&T Ex. 1. pp. 9-11, Tab 1.

This specific part of Connecticut has experienced gaps in coverage dating back to a 1G era with the need for new tower infrastructure only further dictated by today's 4G LTE networks and public demand for high speed reliable wireless services. Over the years, AT&T pursued a water tank on Flower Lane in Norwalk and met with City planning and zoning officials. AT&T Ex. 5. A wireless facility is prohibited under local zoning at the water tank location, the parcel size is a "postage stamp" sized lot in the midst of a residential neighborhood that is too small for effective use by multiple wireless carriers, and significant public opposition to the AT&T concept was raised in 1999. The State Armory property at 284 New Canaan Avenue was recommended to AT&T by the City of Norwalk at that time as the most appropriate location for a wireless facility in this area. The Armory has remained a locally preferred Site for a tower for the past 15 years with no known alternatives. AT&T Ex. 5.

In the past decade, AT&T has also been involved in other projects in this part of Fairfield County. In fact, AT&T is approved to use a tower facility, not yet built, at Silver Hill Hospital in New Canaan, a project that dates back to 2003. (See, Dockets 243 and 401). AT&T Ex. 1, pg. 12-13. Over the past 15 years, AT&T has also constructed wireless facilities on all known existing and approved tower and other facility sites in this area of Connecticut including power lines in Norwalk and water tanks in New Canaan. The lack of any existing wireless infrastructure in the site search area persists and AT&T's coverage gaps consistently documented. AT&T Ex. 1 Tabs 1 & 2.

**B. AT&T's Leasing with the State for the Armory Site &
Technical Consultations with Norwalk and New Canaan**

AT&T consulted with the City of Norwalk as far back as 1999 when the state-owned Armory was identified as the preferred Site for a new tower. From approximately 2000 to

2003, AT&T Wireless engaged State entities in leasing efforts for up to a 180' monopole tower at the Armory. AT&T Ex. 5. In 2003, AT&T further consulted with Norwalk planning and zoning officials and the State Historic Preservation Officer ("SHPO") for a planned 150' AGL monopole facility at the Norwalk Armory. AT&T Ex. 5. SHPO subsequently determined that a 150' monopole tower with antenna platforms would have a significant adverse effect on the Merritt Parkway, a resource on the National Register of Historic Places. AT&T Ex. 5. SHPO's 2003 determination signaled a distinct and permanent shift in how it considers impacts on the Merritt Parkway from communications facilities, particularly in comparison to earlier tower sites which had been approved by that agency in furtherance of Section 106 of the National Historic Preservation Act ("NHPA"). In 2004, AT&T Wireless placed the project on hold for business reasons as the company commenced a merger process with Cingular.

The project was reactivated by AT&T a few years later with leasing efforts recommencing with the State in earnest in January of 2010. AT&T Ex. 5. In 2010 and 2011, AT&T again consulted with SHPO, this time on a revised project and redesign of the tower structure in an effort to obtain a no effect letter for NHPA and FCC National Environmental Protection Act ("NEPA") purposes. AT&T Ex. 5. After a significant consultation with SHPO including field reviews, site visits, drives up and down the Merritt Parkway and a discussion of potential effects related to monopoles, monopines or other "stealth" options, a two-tower design utilizing brown "unipoles" at 140' AGL was issued a no adverse effect letter in the Spring of 2011. AT&T Ex. 1, Attachment 6, AT&T Ex. 5.

In 2011, the State authorized AT&T to file technical reports with the City of Norwalk and Town of New Canaan which were filed in July 2011. AT&T Ex. 1, Attachment 7; AT&T Ex. 5. From July of 2011 through September of 2011, AT&T consulted with municipal officials at several meetings and a public information session in New Canaan where no specific objections, preferences, alternative sites or site design modifications were recommended. AT&T Ex. 1, Attachment 6; AT&T Ex. 5. Importantly, both the City and Town have tacitly supported this

project and both generally understand that a new tower site at the Armory is logical for land use purposes, minimizes visibility of new infrastructure in residential areas of their communities and would allow service from wireless carriers without any substantial impact to residential neighborhoods. *Id.*

During the period of 2010 through the summer of 2013, AT&T representatives negotiated with State officials and after numerous changes to the agreement and multiple agency reviews, a license agreement was approved by the State Office of Personnel and Management, the State Properties Review Board, the Office of the Attorney General, the State Military Department, and the State Department of Public Works. AT&T Ex. 5. This tower project is a first of its kind on State property involving a license for a communications tower facility. AT&T was pleased to work with the Governor's Administration. The State's willingness to make this Site available for consideration as a tower site for service to the public is notable and again evidence of the support this project has at all levels of state and local government.

C. AT&T's Certificate Application, Parties & Intervenors & Pre-Hearing Filings

In September 2013, AT&T submitted its application to the Siting Council for a Certificate to construct, maintain and operate the proposed cellular telecommunications facility at the Norwalk Armory. The address is 284 New Canaan Avenue (Route 123) and identified as parcel number 5-46-76 by the Norwalk Tax Assessor. AT&T Ex. 1. The proposed facility is located in the central portion of the 11.5 acre parcel and is proposed as two 140-foot self-supporting towers with internal antenna arrays and painted brown. AT&T Ex. 1, Attachment 3. The towers, antennas and ground equipment will be located within a 50' x 80' fenced equipment compound area. AT&T Ex. 1, Attachment 3. Vehicular access to the Facility would extend from New Canaan Avenue over the existing driveway and parking lot to the tower compound. AT&T Ex. 1, Attachment 3.

By petition dated November 4, 2013, Cellco Partnership d/b/a Verizon Wireless ("Cellco" or "Verizon") sought and was granted intervenor on November 14, 2013. No other persons,

including municipalities, sought intervenor or party status in Docket 442. The project has elicited few limited appearance comments. Additionally, no state or municipal agency has submitted comments opposing the project.

AT&T submitted responses to Siting Council pre-hearing interrogatories on November 26, 2013. AT&T Ex. 4. Representatives for AT&T posted a sign at the 284 New Canaan Avenue noticing the public of the application and hearing date with instructions on obtaining more information. AT&T Ex. 6, Affidavit of Sign Posting. A field visit, balloon float and public hearing were scheduled by the Council for December 19, 2013.

D. Public Hearing

On December 19, 2013, AT&T raised a balloon at the site location and the Siting Council conducted a field inspection. Tr. 12/19/13, 3-5pm. At the evidentiary hearing, the Siting Council heard comprehensive testimony from AT&T's panel of witnesses and from representatives of Cellco on the need for the facility, lack of other alternative sites and that the environmental effects associated with construction of a tower at the Armory would not be significant or adverse. Tr., 12/19/13, 3-5pm. A presentation of the proposed facility was provided to the public at the 7:00 pm public hearing session and only two comments were made, after which the public hearing was closed. Tr. 12/19/13, 7pm.

E. Reopened Hearing - SHPO

In January of 2014, the Council deliberated on the merits in Docket 442 at which time, questions regarding SHPO's role for purposes of federal law and the tower design as presented in the Application were raised by various members of the Council. 1/23/14 CSC Meeting Minutes. The Council thereafter voted on its own motion to reopen Docket 442 to facilitate a further exchange by and among the Council, SHPO and the Applicant regarding the historic listing of the Merritt Parkway and SHPO's prior determinations. Council Memo to Parties & Intervenor, 1/27/14. The Chairman and Executive Director of the Siting Council subsequently met with SHPO representatives to discuss SHPO's federal obligations and its considerations

under federal law in reviewing telecommunications tower projects. Council Memo to Parties & Intervenors, 2/11/14. Thereafter, AT&T wrote to the SHPO seeking clarification and interpretation of SHPO's 2011 no significant adverse effect determination for the tower project as proposed in Docket 442. Applicant Letter to SHPO, 02/12/14 (Fisher Correspondence). Specifically, AT&T asked SHPO if the determination could be interpreted to permit a 130' monopole tower with antenna platforms painted to blend with the surroundings. *Id.* Mr. Libertine and Attorney Fisher thereafter met with SHPO representatives in March of 2014 to advocate for flexibility in interpreting the no significant adverse effect determination for the project. In March 27, 2014 correspondence, SHPO reconfirmed its 2011 no significant adverse effect determination for the project subject to a condition that brown unipoles up to 140' in height be constructed at the Armory Site. 3/27/14 SHPO Correspondence. SHPO further stated that a 130' monopole with antenna platforms painted to match the surroundings would have an adverse effect on the historic character of the Merritt Parkway for purposes of the NHPA and FCC NEPA regulations and would not be approved by it consistent with its prior determinations from 2003 on the project. *Id.*

In preparation for a continued evidentiary hearing in Docket 442, AT&T pre-filed direct testimony of Mr. Michael Libertine, regarding consultations with SHPO and its determinations for purposes of the NHPA and NEPA. Applicant Ex. 11. On April 15, 2014, the Council cross-examined Mr. Libertine in detail regarding the project, including his expert opinion that two brown unipole towers 48" in diameter would not have a significant visual impact on any residential neighborhoods given wooded buffers. Tr. 4/15/14. Further, Mr. Libertine testified that visibility was limited principally to the Merritt Parkway and Route 123 with existing views of transportation and utility infrastructure and the Norwalk Armory building itself. *Id.* AT&T further reaffirmed all of the expert opinions that there is a public need for a tower and no significant adverse environmental effects from the project. Tr. 4/15/14.

POINT I

A PUBLIC NEED CLEARLY EXISTS FOR A NEW TOWER FACILITY AT THE ARMORY

Pursuant to Section 16-50p(a)(2)(A) of the General Statutes, the Council is required to find and determine as part of any Certificate application, “a public need for the proposed facility and the basis for that need”. CGS § 16-50p(a)(1). In this Docket, AT&T provided coverage analyses and expert testimony that clearly demonstrates the need for a new tower facility to provide reliable wireless services to homes, businesses and the traveling public along Routes 123 and 15 (Merritt Parkway). To reliably serve the public, AT&T has testified it requires one tower at a minimum height of 140’ AGL in a unipole configuration as proposed. AT&T Ex. 1, Tab 1; AT&T Ex. 4, Responses to Interrogatories. Cellco further confirmed its own independent need through its own submissions and testimony that it has a minimum height of 120’ in a unipole configuration. Cellco Ex. 2. No evidence exists to rebut AT&T and Verizon’s testimony on the subject of a public need for a new tower in this part of the State, a matter that is not factually in dispute.

POINT II

AT&T’S PROPOSED TOWER FACILITY PRESENTS NO SIGNIFICANT ADVERSE ENVIRONMENTAL EFFECTS

Pursuant to Section 16-50p(a)(2)(B) of the General Statutes, the Council is required to find and determine as part of a Certificate application:

“the nature of the probable environmental impact of the facility alone and cumulatively with other existing facilities, including a specification of every significant adverse effect, including, but not limited to, electromagnetic fields that, whether alone or cumulatively with other effects, impact on, and conflict with the policies of the state concerning the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forests and parks, air and water purity and fish, aquaculture and wildlife”

AT&T respectfully submits the following are the identified environmental effects associated with this project in reference to Section 16-50p(a)(2)(B) of the General Statutes:

- Natural Environment - There are no impacts of significance as the tower site area is in a previously developed grassy field adjacent to a parking lot which is periodically used by the Connecticut National Guard to stage or store trucks and other military equipment. The tower facility itself is not located in wetlands and the compound has been proposed in a grass field roughly equidistant from wetlands on two sides. Wetlands in the area have been previously disturbed by development of the Merritt Parkway, the Armory and a gas pipeline that runs through the Site. AT&T's expert testified that grading in the grassy area approximately 45' away from wetlands would have minimal impacts and be considered a minor activity under Norwalk regulations for work in an upland review area. AT&T Ex. 1, Tab 4. Tr. 12/19/13, 3-5pm., Tr. 4/15/14.
- Ecological Balance - There are no adverse impacts of note given the use of existing established access drives and a previously developed and disturbed area on a State military installation for development of a tower site in a relatively small 4,000 square foot area of the over 11 acre Site.
- Public Health & Safety - There are no adverse effects from the proposed infrastructure on public health and safety and the facility will comply with FCC standards regarding radio frequency emissions. Indeed, the service to be provided by the Facility will have a positive impact on the public's health and safety.

- Scenic - There are no documented scenic resources in the area around the Armory Site.
- Historic - The SHPO has determined that, with conditions, two unipole towers at the Armory Site will not have a significant adverse effect on the Merritt Parkway which is on the National Register of Historic Places. Other tower structures including a single monopole with external antenna arrays or a monopine were determined by SHPO to have a significant adverse effect.
- Recreational Values - The Armory Site is not publicly accessible and there are no known recreational resources that would be impacted by the proposed tower facility.
- Forests & Parks - There are no known visual impacts on any forests or parks.
- Air & Water Purity - The tower facility is unoccupied with no sanitary facilities with minimal impervious surfaces. Best practices for storm water and erosion controls will be implemented during construction. AT&T Ex. 1, p. 16, Tab 3. Air emissions and relatively limited fuel storage as part of emergency backup power generation on-site will comply with DEEP general permits and be contained in accordance with industry standards. There will be no adverse impacts to air or water purity as part of routine operation of the facility.
- Fish, Aquaculture & Wildlife - The setting in this area of Connecticut is predominantly suburban with transportation corridors. Connecticut Department of Energy and Environmental Protection ("DEEP") and other agencies did not identify any flora or fauna of concern as related to the AT&T project at the Armory.

The Applicant submits that the proposed facility presents no environmental effects that rise to the level of being adverse or significant alone or cumulatively for purposes of the state environmental resources listed in Section 16-50p(a)(2)(B) of the General Statutes. Additionally, this Application presents no matters for consideration pursuant to Section 16-50p(a)(2)(G) of the General Statutes (*i.e.* it is not agricultural, water supply or school land). As such, the Applicant submits that there are no environmental effects that would warrant a denial of the Application. *See*, Section 16-50p(C).

POINT III

THERE ARE NO EXISTING TOWERS TO SHARE

Section 16-50p(b)(1)(A) (b) (1) states that “prior to granting an applicant’s certificate for a facility...the Council shall examine...the feasibility of requiring an applicant to share an existing facility, as defined in subsection (b) of section 16-50aa, within a technically derived search area of the site of the proposed facility, provided such shared use is technically, legally, environmentally and economically feasible and meets public safety concerns. In this proceeding, AT&T submitted significant evidence that there are no existing towers, or even structures or other viable alternative properties for tower construction, to provide reliable service to this area of Norwalk or New Canaan. AT&T’s search for sites included a comprehensive investigation at multiple points in time over a period of fifteen (15) years including an investigation of an existing water tank and other potential tower site locations in the area. AT&T Ex.1, Tab 2. While not a legal consideration for the Council in ruling on this Application, AT&T notes that any other alternative tower site would necessarily involve a facility in a residential neighborhood as compared with this proposal at a military installation at the intersection of major transportation corridors. AT&T Ex.1, Tab 2, Ex. 5. Importantly, the City of Norwalk and Town of New Canaan have either suggested or tacitly acknowledged the State

Armory location as a good one for a tower site. In fact, no third party or member of the public has suggested any alternative. Based on its lengthy and comprehensive investigation of alternatives AT&T submits that the record clearly demonstrates that the State Armory location best meets the criteria set forth in Section 16-50p of the General Statutes for a tower site and that there are no existing tower sharing alternatives.

POINT IV

THE ARMORY SITE IS NOT IN A STATE OR LOCAL DESIGNATED SCENIC AREA AND THERE ARE NO SUBSTANTIAL VISUAL IMPACTS FROM THE PROPOSED TOWER FACILITY

Section 16-50p(b)(1)(C) of the General Statutes requires the Council to examine whether or not a tower facility has been proposed in an area identified by DEEP or a municipality "to be a relatively undisturbed area that possesses scenic quality of local, regional or state-wide significance." There are no such designations in the areas of the tower facility proposed in Docket 442 and it is not located in a residential neighborhood. Indeed, the record in this Docket demonstrates that the proposed tower facility at the Armory will have no significant or substantial visual impact on any land uses in the area including any adjacent residences.

The two proposed 140' brown unipoles will be visible year-round from just 7.6 acres which is less than 1% of the 8,053 acre Study Area. AT&T Ex.1, Tab 5 ("Visual Report"). As demonstrated in the Visibility Report, the majority of year-round visibility would occur in close proximity to the facility with most of it on the Armory Site or from the Merritt Parkway and State Route 123. AT&T Ex.1, Tab 5. The Visibility Report notes that only 4 residential properties may have partial year-round views of the very top of the towers. AT&T Ex.1, Tab 5. Simply put, the proposed tower facility, including two tower structures, have little visual effect and certainly no appreciable visual impact on any neighborhoods to the south in Norwalk or north in New Canaan. *See*, Section 16-50p(b)(1)(i).

POINT V

**THE PROPOSED FACILITY HAS BEEN SPECIFICALLY DESIGNED FOR
SHARED USE IN ACCORDANCE WITH STATE STATUTES**

Section 16-50p(b)(1)(B) of the General Statutes requires the Council to examine in a tower application whether:

[A]ny such facility, if constructed, may be shared with any public or private entity that provides telecommunications or community antenna television service to the public...

As such, the Council in deciding tower applications has a current and future planning function as it relates to tower facilities. Indeed, planning for future shared use of a new tower site is not fundamentally limited to considering the Applicant's specific need in making public need considerations pursuant to Section 16-50p of the General Statutes.

The Council's planning function is particularly important given that there are multiple FCC licensed wireless carriers in the Connecticut marketplace who will seek to share use of tower infrastructure in the state when capital is available and based on each carrier's plans. These plans often do not coincide with another carrier's build plan and generally tower sharing decisions are made well after a tower site is approved by the Council. Of note, any correspondence a carrier may send to the Council regarding "need" related to a pending Docket is simply a snapshot in time and long term it is likely all carriers will share use of each other's towers to provide competitive services to the public as envisioned by Congress and the FCC.

AT&T routinely considers the potential need for its competitors to share tower sites it proposes to the Siting Council in furtherance of state policy favoring tower sharing as articulated in Section 16-50aa and to aid the Council in furtherance of its planning function set forth in Section 16-50p(b)(1)(B) of the General Statutes. AT&T's compounds, towers and facility sites are consistently designed to accommodate shared use by competitors. Over the years,

various planning tools have been pioneered by the Siting Council and readily embraced by AT&T. Examples include expandable towers, taller towers than needed by AT&T, or multiple unipoles at one tower site. Specific examples as relevant to this Docket include AT&T's Redding Connecticut tower which is a 180' unipole built 30' taller than needed by AT&T for collocation purposes and to mitigate potential impacts on the Town's historic green. *See*, Docket 404. Another relevant example is Verizon's two 115' unipole tower facility on Round Hill Road in Greenwich which was built to accommodate four wireless carriers with a shorter overall facility height to reduce area visibility. *See*, Docket 309.

As the Council is aware, AT&T generally opposes unipole tower designs given the operational limitations such structures impose in providing reliable services to the public. On this particular project the record reflects at least three different times over the course of 15 years where AT&T sought SHPO approval of a monopole with platforms all of which were rejected by SHPO as having a significant adverse effect on the nationally historic Merritt Parkway. As more fully set forth in correspondence to the Council, these efforts were undertaken as recently as March of 2014. SHPO, which has legal authority under federal statutes and FCC rules and regulations, simply will not approve a monopole with platforms at this Site. *See*, Department of Economic and Community Development, 03/27/14. As such, this is a situation where AT&T has had to compromise in an effort to provide its service in this part of Fairfield County.

Given the foregoing, AT&T sought to address its need for a tower facility, the legal prohibition by SHPO on use of a monopole or monopine by presenting a tower facility that incorporates a unipole in Docket 442. Additionally, to address the statutory considerations in Section 16-50p(b)(1)(B) and (D) of the General Statutes, AT&T planned the site for a second unipole tower in the compound should it be needed by other carriers now or in the future. This because a single 140' unipole would not likely meet the needs of three other competing carriers in providing service in this part of the State based on the physical space limitations in

the pole itself. That planning proved appropriate given Verizon's intervention in this Docket and the likely need for T-Mobile and Sprint/Nextel to locate facilities at the Site should they seek to reliably serve their customers in this area of Connecticut.

Ultimately, the Council has the discretion to determine how to plan for and address future shared use of tower facilities like the one proposed in Docket 442. In fact, Section 16-50p(b)(2) specifically states that: "when issuing a certificate for a facility described in subdivision (5) or (6) of subsection (a) of section 16-50i, the council may impose such reasonable conditions as it deems necessary to promote immediate and future shared use of such facilities and avoid the unnecessary proliferation of such facilities in the state." In this Docket, the Applicant respectfully submits that the two unipole tower design is an appropriate way to plan for shared use and avoid the proliferation of towers that might occur on other Sites in this area of Norwalk or New Canaan without such a design. Of note, after this project was conceived and planned, AT&T's LTE deployments and the required equipment to support 4G network speeds and throughput have increased the amount of equipment necessary and the reasonable diameter of any unipole to 48". In this regard, AT&T's visual experts concluded that the visual massing of two such towers was still less than a fully loaded four carrier monopole with antenna platforms. In the end though, AT&T only has a need for one unipole tower at 140' in height and it would not object to a modification the Council may impose in issuing a Certificate in Docket 442 that might require Verizon to share use of one such tower structure and address any future shared use of the facility by other competitors in the marketplace to a future proceeding.

CONCLUSION

AT&T, with the support of Cellco Partnership, has demonstrated a public need for and lack of any significant adverse environmental effects associated with the proposed facility presented in this Docket. AT&T's evidence and testimony, as well as that of Cellco Partnership, established a public need for the proposed facility and no party or intervenor presented

competent evidence challenging the need for the Facility to provide reliable wireless services. There are no tower sharing opportunities and long term discussions with municipal and state officials conclusively establish that the Armory Site is the only practical location for the siting of the needed tower facility. Moreover, there are limited environmental effects associated with the proposed facility, none of which individually or cumulatively is adverse such that the balancing test is decidedly tilted in favor of issuing a Certificate. Indeed, the Applicant respectfully submits that in issuing a Certificate in Docket 442, the most important consideration for the Council is whether or not to approve now a second unipole tower to meet Verizon's stated height needs and/or address future collocation by other competitors in the wireless marketplace.

Respectfully Submitted,



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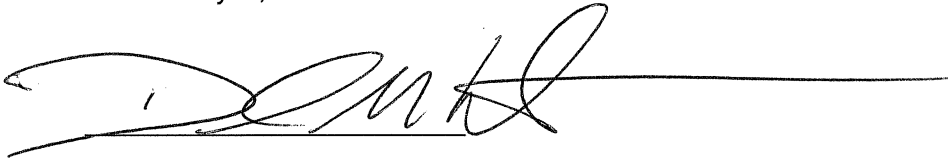
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CERTIFICATE OF SERVICE

I hereby certify that on this day, an original and fifteen (15) copies of the foregoing was sent electronically and by overnight delivery to the Connecticut Siting Council:

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Dated: May 8, 2014

A handwritten signature in black ink, appearing to read 'DML', is written over a horizontal line.

Daniel M. Laub

cc: Michele Briggs, AT&T
Consultant Team
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