

STATE OF CONNECTICUT
SITING COUNCIL

New Cingular Wireless PCS, LLC : DOCKET # 447
Application for a Certificate of Environmental
Compatibility and Public Need for the construction,
Maintenance, and operation of a telecommunications
Facility located at
Stamford Tax Assessor Map 1, Parcel 1379
560 West Hill Road, Stamford, Connecticut.

: APRIL 9, 2014

INTERROGATORIES TO APPLICANT

The following Interrogatories are directed to the Applicant by the Intervenor.

1. What propagation model does the applicant employ to determine calculated coverage?
2. What is the frequency band that is depicted in the coverage plots submitted with the Application?
3. What clutter model and what terrain data base were utilized in these calculations?
4. What effective radiated power and antenna type along with beam tilt, if applicable, were utilized in these calculations?
5. Were drive tests ("scan tests") that would verify the results of the calculated plots conducted? If so, please provide the data sets which were generated by the tests and note whether the data needs to be corrected for variables including, but not limited to, antenna position, gain and line loss.
6. Has the applicant performed continuous wave ("CW") tests from the proposed site or any other site either identified or considered?
7. In calculating the expected coverage from the proposed site, what antenna centerlines, antenna types and effective radiated power did the applicant assume would be put in use?

8. Has the applicant performed a minimum height analysis to determine the minimum antenna centerline that it requires to meet its alleged coverage needs?

9. By what method was it determined that identified alternate sites did not meet the needs of the Applicant? If studies were conducted to confirm the utility of the alternate sites, please provide copies of those studies?

10. What antenna centerlines, antenna types and effective radiated power did the applicant assume to determine expected coverage from alternate sites indicated?

11. Is there another combination of alternate sites that could be utilized to achieve the alleged coverage needs?

12. What alternate means of achieving the alleged coverage needs have been explored?

13. Does the applicant possess any data that support either dropped calls, customer complaints or other switch based or customer service representative based information that supports its claim of lack of service in the entire area that it claims it has a coverage issue?

14. Are there other sites in the community that is the subject of these proceedings at which the Applicant is considering developing wireless communications facilities? Please describe.

15. Please name all carriers with whom you have reason to believe will co-locate on the proposed facility.

16. Please state whether your site search considered nearby commercial properties at 408 Long Hill Road, 270 Long Hill Road and 120 Long Hill Road? If not, why did AT&T choose a residential neighborhood for its industrial facility?

17. What is the percent of dropped calls in the target area?

18. How many residential wireless customers will this facility serve?

19. What surety does the Applicant propose to do to ensure the proper decommissioning of the facility once it is no longer needed or in use? And will the Applicant provide a bond to ensure decommissioning?

20. Please describe the methods used by your visual impact consultant to calculate seasonal visibility.
21. What studies did you undertake to eliminate alternate technologies from consideration given that they are of lesser impact to surrounding property uses?
21. Who conducted the feasibility studies on alternate technologies?
22. Please provide the feasibility studies or data by which you determined the lack of feasibility?
23. Have you considered using a combination of two shorter towers just above treeline to cover the target area?
24. Is there a particular standard or decibel signal strength which you believe is necessary for adequate coverage for PCS (1900MHz) service in the target coverage area? For 850MHz service? For 700 MHz
25. What particular dBm signal strength do you believe is necessary for in-vehicle coverage for PCS (1900MHz), 700 MHz and 850MHz in the target area?
26. In the proposed coverage maps submitted by the Applicant, what loss margin was assumed in the modeling?
27. For any signal strength predicted by your coverage modeling, what percent-of-locations is assumed for reliability? (e.g: 85% of locations, 95%?)
28. Are you assuming that your target coverage is 'reliable service' or "adequate coverage"? Do these two terms differ? How do you define these two terms for the purposes of meeting the goals of the Telecommunications Act of 1996?
29. Will the Applicant voluntarily provide reasonable access to the site by Intervenor's wetlands expert to perform a wetlands assessment, provided he is able to provide an insurance certificate?
30. Given that the Application indicates that the Applicant has performed some analysis of onsite wetlands systems, please provide copies of the field log books or notes made by your consultants regarding any site visit prior and up to the hearing in this matter.

31. What is the percentage of dropped calls and ineffective attempts, as compared to the remainder of the Market Trading Area for the Ridgefield area?
32. What is the lowest height you can construct a tower to improve coverage (with and without co-located carriers)?
33. Has the Applicant considered utilizing cedar fencing and equipment enclosures with an architectural vernacular in keeping with the residential nature of the surrounding neighborhood?
34. Please identify how many other future sites will be necessary, at a minimum to accomplish adequate coverage for the target municipality.
35. Please identify any sites in addition to the Proposed Facility on which the Applicant intends to seek permission from the Siting Council to construct or modify a facility in the Stamford area (Stamford and Greenwich and New Canaan)?
36. Will construction practices for the proposed facility conform completely to local building and zoning ordinances and regulations? If not, in what way will this facility not comply?
37. Can you provide coverage propagation maps and isolated propagation maps for the proposed facility on clear plastic overlays using a scale that matches that of the Application at 4 dBm intervals?
38. What is the minimum dBm signal strength to accomplish hand off of a call to an adjacent cell for 700Mhz, 850 MHz and 1900 Mhz?
39. What are the coordinates, antenna heights, antenna types, orientations, tilt, EIRP for all of the Applicant's wireless facilities in Stamford and adjacent towns?
40. Who are the members of New Cingular Wireless PCS, LLC and where do they reside?

Respectfully Submitted,

Intervenor,

By _____

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CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 9th day of April, 2014 and addressed to:

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

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