

**CONNECTICUT SITING COUNCIL**

**APPLICATION OF CELLCO PARTNERSHIP )**  
**d/b/a VERIZON WIRELESS TO THE ) DOCKET NO. 448**  
**CONNECTICUT SITING COUNCIL FOR A )**  
**CERTIFICATE OF ENVIRONMENTAL ) SEPTEMBER 2, 2014**  
**COMPATIBILITY AND PUBLIC NEED )**  
**FOR THE CONSTRUCTION MAINTENANCE )**  
**AND OPERATION OF A TELE- )**  
**COMMUNICATIONS FACILITY LOCATED )**  
**AT ORANGE TAX ASSESSOR MAP 77, )**  
**BLOCK 3, LOT 1, 831 DERBY MILFORD )**  
**ROAD, ORANGE, CT )**

**PRE-HEARING INTERROGATORIES & REQUESTS FOR PRODUCTION DIRECTED**  
**TO CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS**

1. Please identify by name, position and address, any person answering or assisting in responding to these interrogatories and requests for production on behalf of Cellco Partnership d/b/a Verizon Wireless (hereinafter “Verizon” or “Cellco”).
  
2. Since the last hearing of the Connecticut Siting Council (“CSC”) on August 12, 2014, has Verizon obtained any additional information or records regarding the viability of the Mount Saint Peter’s Cemetery property at 219 New Haven Avenue, Derby, CT (“Mt. St. Peter’s Cemetery”) as an alternative location?
  
3. If you answered Interrogatory 2 in the affirmative, what information did Verizon obtain regarding Mt. St. Peter’s Cemetery?
  
4. If you answered Interrogatory 2 in the affirmative, please provide copies of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, including electronic) regarding the Mt. St. Peter’s Cemetery.

5. If you answered Interrogatory 2 in the affirmative, please identify the name, position and address of any person who has reviewed, inspected and/or analyzed the Mt. St. Peter's Cemetery on behalf of Verizon?

6. Are there any locations on the Mt. St. Peter's Cemetery where a cell tower and related facilities could be located?

7. If you answered Interrogatory 6 in the affirmative, please describe each location on the Mt. St. Peter's Cemetery where a cell tower and related facilities could be located. If possible, please also designate those possible locations on a map.

8. If you answered Interrogatory 6 in the affirmative, for each such location please explain whether or not said location could be used by Verizon to achieve any part of the coverage and/or capacity needs that Verizon seeks to achieve as part of Docket No. 448.

10. In the prefiled testimony of Jamie Laredo, Jr., dated July 8, 2014, Mr. Laredo testified that – “[o]nce a capacity problem is identified we look at several options before we issue a search ring for a new cell site.” Did Verizon consider any “options” before issuing a search ring for the subject property at 813 Derby Milford Road, Orange, CT (the “Subject Property”)? If so, what “options” did Verizon consider?

11. Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing “Shelton 2” cell site?

12. If you answered Interrogatory 11 in the affirmative, please describe any such adjustments and/or changes that were made.

13. If you answered Interrogatory 11 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

14. If you answered Interrogatory 11 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

15. If Verizon did not make any adjustments or changes to any antennas at its existing "Shelton 2" cell site, please explain why.

16. Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing "Derby" cell site?

17. If you answered Interrogatory 16 in the affirmative, please describe any such adjustments and/or changes that were made.

18. If you answered Interrogatory 16 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

19. If you answered Interrogatory 16 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

20. If Verizon did not make any adjustments or changes to any antennas at its existing "Derby" cell site, please explain why.

21. Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing "Derby North" cell site?

22. If you answered Interrogatory 21 in the affirmative, please describe any such adjustments and/or changes that were made.

23. If you answered Interrogatory 21 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

24. If you answered Interrogatory 21 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

25. If Verizon did not make any adjustments or changes to any antennas at its existing "Derby North" cell site, please explain why.

36. Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing "Orange 2" cell site?

27. If you answered Interrogatory 27 in the affirmative, please describe any such adjustments and/or changes that were made.

28. If you answered Interrogatory 27 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

29. If you answered Interrogatory 27 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

30. If Verizon did not make any adjustments or changes to any antennas at its existing "Orange 2" cell site, please explain why.

32. Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing "Orange 3" cell site?

32. If you answered Interrogatory 32 in the affirmative, please describe any such adjustments and/or changes that were made.

34. If you answered Interrogatory 32 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

35. If you answered Interrogatory 32 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

26. If Verizon did not make any adjustments or changes to any antennas at its existing "Orange 3" cell site, please explain why.

27. Once Verizon identified that it had a capacity problem in the area surrounding the subject property, did Verizon make any adjustments or changes to any antennas at its existing "Milford NE" cell site?

28. If you answered Interrogatory 27 in the affirmative, please describe any such adjustments and/or changes that were made.

29. If you answered Interrogatory 27 in the affirmative, please explain the reasons why any such adjustments and/or changes were made.

30. If you answered Interrogatory 27 in the affirmative, please explain any changes in coverage and/or capacity that Verizon experienced from such adjustments and/or changes.

31. If Verizon did not make any adjustments or changes to any antennas at its existing "Milford NE" cell site, please explain why.

32. Did Verizon determine whether the capacity needs that it is claiming as part of this Docket 448 “relate to a specific use or customer”?

33. If you answered Interrogatory 32 in the affirmative, please describe the manner in which the capacity needs relate to a specific use or customer.

34. If you answered Interrogatory 32 in the affirmative, please describe any information which supports that conclusion and please provide copies of any records and/or documents which were relied upon by Verizon to make said conclusion.

35. If Verizon did not make a determination as to whether or not the capacity needs that it is claiming as part of this Docket 448 “relate to a specific use or customer”, please explain why.

36. Defining “Sunnyside” as the area of development in Shelton that is located west of the Housatonic River, generally bounded by the bend of the river that is generally west of the Subject Property, did Verizon consider the Sunnyside area for a search ring? If not, please explain why.

37. If you answered Interrogatory 36 in the affirmative, please provide any information pertaining to Verizon’s efforts to consider the Sunnyside area.

38. Please provide any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to consider the Sunnyside area.

40. Did Verizon developing any “small cell installations” in the Sunnyside area? If not, please explain why.

41. If you answered Interrogatory 40 in the affirmative, please provide any information pertaining to Verizon's efforts to consider the implementation of any small cell installations in the Sunnyside area.

42. Please provide any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to consider the implementation of any small cell installations in the Sunnyside area.

43. In the prefiled testimony of Jamie Laredo, Jr., dated July 8, 2014 (Pg 4, Question 6), Mr. Laredo testified that "historic cell site performance and utilization data...allows Celco to forecast when any individual or combination of cell sites will reach their capacity limits." Is the information submitted by Verizon on August 5, 2014, titled "Applicant's Response to the Siting Council's Request for Additional Information", Attachment 2, the only "performance and utilization data" relied upon in establishing the Orange North search ring? If so, please explain why.

44. If you answered NO to Interrogatory No. 43, what other performance and utilization data, if any, did Verizon rely upon to evaluate capacity needs to the selection of a search ring for the Orange North facility?

45. Was Verizon able to produce any performance and utilization data for 2100 MHz LTE? If yes, please produce any such performance and utilization data. If no, please explain why.

46. Who was authorized on behalf of Verizon to release the Orange North search ring for a site search?

47. Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to establish and/or release the Orange North search ring.

48. In the prefiled testimony of Jamie Laredo, Jr., dated July 8, 2014 (Pg. 4, Question 6), Mr. Laredo testified that “population” was part of the historic cell site performance and utilization data that Verizon considers. Therefore, was there any research and/or analysis of population performed in the process of establishing a search ring in the vicinity of the Subject Property? If so, please describe any applicable research and/or analysis and please provide a copy any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, including electronic) which Verizon relied upon or referenced in order to conduct any such population research and/or analysis.

49. If Verizon did not perform any research and/or analysis of population in the process of establishing a search ring in the vicinity of the Subject Property, please explain why.

50. In the process of establishing the Orange north search ring, were any population counts, or other population assessments, performed on any of the sectors listed as having a substantial capacity relief from the proposed Orange North facility? If so, what information did Verizon obtain? If not, why?

51. Please provide a copy of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any population counts, or other population assessments, performed on any of the sectors listed as having a substantial capacity relief from the proposed Orange North facility.

52. In the process of establishing the Orange North search ring, did Verizon evaluate the population that would be diverted to the Orange North facility and away from utilizing each of the relevant existing sectors. If so, what information did Verizon obtain? If not, why?

53. Please provide a copy of any documents in Verizon’s possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any information that Verizon obtained to evaluate whether the population would be diverted to the Orange North facility and away from utilizing each of the relevant sectors.



54. In the process of establishing the Orange North search ring, did Verizon perform any research and/or analysis of the geographic areas to which any or each particular existing sector is the dominant server? If so, what information did Verizon obtain? If not, why?

55. Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any research and/or analysis that Verizon performed of the geographic areas to which any or each particular existing sector is the dominant server.

56. In the process of establishing the Orange North search ring, did Verizon perform any research and/or analysis where existing and proposed Orange North sectors will be the dominant server? If so, what information did Verizon obtain? If not, why?

57. Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any research and/or analysis that Verizon performed where the existing and proposed Orange North sectors will be the dominant server.

58. In the process of establishing the Orange North search ring, did Verizon prepare and/or review any so-called traffic maps of the eight existing sectors reported in this Application? If so, what information did Verizon obtain? If not, why?

59. Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any traffic maps of the eight existing sectors that Verizon prepared and/or reviewed.

60. Does Verizon have any other search rings or facilities planned or in process (collectively, "Planned Facilities") that would affect the capacity utilization of any of the eight sectors in the Application? If not please explain why. If so, please provide the following:

A) the location, antenna height and other transmission characteristics of each Planned Facility;

B) identify the existing sectors that each of those Planned Facilities would provide significant capacity relief to;

C) identify any Orange North sectors that any Planned Facilities would provide significant capacity relief to;

D) identify any Orange North sectors that any Planned Facilities would reduce the geographic area served by the Orange North sectors; and

E) Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) pertaining to any of the information referenced in response to Interrogatory No. 60.

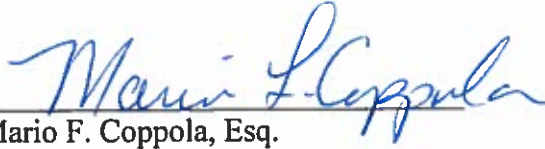
61. Is the lessor amenable to relocating the facility to the location that is shown on the attached Exhibit 1 as "Point", and located at 41°17'50.90"N 73° 3'29.30"? If not, please explain why.

62. Is the lessor amenable to relocating the facility to the location that is shown on the attached Exhibit 1 as "Garage", and located at 41°17'49.91"N 73° 3'28.17"W? If not, please explain why.

63. Is the lessor amenable to relocating the facility to the location that is shown on the attached Exhibit 1 as "Barn", and located at 41°17'52.90"N 73° 3'22.17"W. If not, please explain why.

64. Please provide a copy of any documents in Verizon's possession (including but not limited to any and all papers, reports, records and communications, including electronic) which you relied upon or referenced in order to respond to any of these interrogatories.

**RESPECTFULLY SUBMITTED BY:  
ALBERT SUBBLOIE, JACQUELINE BARBARA, GLENN  
MACINNES, JILL MACINNES**

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**CERTIFICATE OF SERVICE**

This is to certify that on the above date a true copy of the foregoing has been sent by U.S.

Mail, first-class, postage pre-paid, to the following parties of record:

Melanie Bachman, Esq., Executive Director, Connecticut Siting Council, 10 Franklin Sq., New Britain, CT 06051 (1 original, 15 copies, plus 1 electronic)

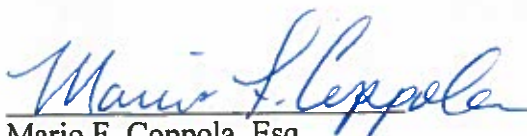
Cellco Partnership d/b/a Verizon Wireless, Kenneth Baldwin, Esq.; Robinson & Cole, 280 Trumbull Street, Hartford, CT 06103

Senator Gayle Slossberg, Legislative Office Building, Room 2000, Hartford, CT 06106

State Representative Paul Davis, Legislative Office Building, Room 4045, Hartford, CT 06106

State Representative Themis Klarides, Legislative Office Building, Room 4200, Hartford, CT 06106

State Representative James Maroney, Legislative Office Building, Room 5006, Hartford, CT 06106

  
Mario F. Coppola, Esq.

# **EXHIBIT 1**



Legend

Alternate Locations



200 ft

Proposed Orange Nbrith

Point

Garage

Barn

Coley Mill Rd

Google earth  
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