

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
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 :
 APPLICATION OF MESSAGE CENTER : DOCKET NO. 449
 MANAGEMENT, INC. AND NEW :
 CINGULAR WIRELESS, PCS LLC (AT&T) :
 FOR A CERTIFICATE OF :
 ENVIRONMENTAL COMPATIBILITY AND :
 PUBLIC NEED FOR THE CONSTRUCTION, :
 MAINTENANCE AND OPERATION OF A :
 WIRELESS TELECOMMUNICATIONS :
 FACILITY AT 186 BLACK ROCK :
 TURNPIKE, REDDING, CONNECTICUT : OCTOBER 9, 2014

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

Introduction

On May 16, 2014, Message Center Management, Inc. (“MCM”) and New Cingular Wireless PCS, LLC (“AT&T”) (collectively, the “Applicant”) 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 behind the Redding Ridge Fire District 1 (“RRFD”) at 186 Black Rock Turnpike in Redding, Connecticut (the “Property”). The Applicant proposes to replace the existing 80-foot RRFD tower facility with a 150-foot tall monopole tower¹. AT&T antennas are proposed to be located at the 150-foot level on the tower. Equipment associated with the antennas would be installed near the base of the tower within a 47-foot by 48-foot

¹ According to a draft determination from the Connecticut State Historic Preservation Officer (“SHPO”), a tower at the Property taller than 120 feet AGL would have an adverse effect on historic resources in the area. (Tr. 1, pp. 16-20).

fenced facility compound. (Applicant's Exhibit ("Exh.") 1).

On May 28, 2014, Cellco Partnership d/b/a Verizon Wireless ("Cellco") filed a petition to intervene in the Docket No. 449 Application and hearing process. (Cellco Exh. 1). The Council granted Cellco intervenor status in this proceeding on June 12, 2014. The Council conducted an evidentiary and public hearing on the Application on July 29, 2014 (Hearing Transcript ("Tr."), p. 4). The hearing was continued to September 9, 2014. (Tr., p. 161). 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. (Tr., p. 203).

Cellco's Need for the Proposed RRFD Facility

Cellco has maintained a search ring in eastern Redding since early 2007 when it intervened in a Sprint application for a tower site at the RRFD site. (Council Docket No. 334). The search ring has remained active since that time. (Cellco Exh. 2, Q. 1). Although the Docket No. 334 application was approved, Sprint failed to construct the facility in the time frame permitted and the Docket No. 334 Certificate expired. (Admin. Notice No. 25).

Cellco's need for wireless service in eastern Redding is well documented in the Docket No. 449 record. Evidence in the record confirms that Cellco maintains gaps in wireless service along significant portions of Route 58, Cross Highway and along secondary roads and in residential areas throughout eastern Redding. (Cellco Exh. 2, Q. 14, 24, 26, 27; Cellco Exh. 3, Q. 38-41). Coverage from Cellco's nearest adjacent sites in Redding, Easton and Weston Connecticut cannot fill these existing gaps in service. (Cellco Exh. 2, Q. 14). In addition, system performance data indicates that for those sectors of its adjacent cell sites directed toward the RRFD site, Cellco experiences dropped calls at a rate of 2.2% and ineffective attempts at a rate of 2.14%. Cellco's network design objectives for dropped calls and ineffective attempts is less

than one percent (1%). (Cellco Exh. 2, Q. 14).

Cellco's Radio Frequency (RF) engineers have determined that its wireless service needs in this area can be satisfied by installing antennas at a minimum height of the 120 feet above ground level ("AGL") on the proposed MCM monopole tower at the Property. Because its existing wireless coverage in the area is very limited, Cellco would prefer to install its antennas at the 140 foot level on the proposed tower, ten (10) feet below the AT&T antennas. (Cellco 2, Q. 20). If, however, the Council approves a tower height of only 120 feet, as recommended by the SHPO, Cellco would install its antennas at a height of 110 feet AGL. Installing antennas at the 110 foot level on the proposed tower would result in a reduction in the overall coverage footprint from the site and may require the installation of additional wireless facilities to the north and south of the Property to make up for the service deficiencies of a shorter tower. (Cellco Exh. 4, Q. 43-47; Tr., pp. 190, 194-197).

Cellco's Proposed Facility Installation

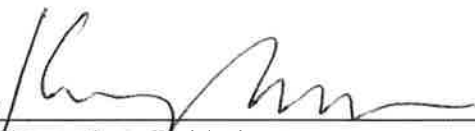
Cellco would install twelve (12) antennas and six (6) remote radio heads on a low profile platform at its approved height on the tower. (Cellco Exh. 2, Q. 3-6 and 7). Equipment associated with Cellco's antennas would be located inside a 12' x 20' shelter located within the proposed facility compound. (Applicant's Exh. 1). Cellco and AT&T would share a new propane-fueled back-up generator located adjacent to the facility compound. (Tr., pp. 180-182, 189).

Conclusion

The evidence in the Docket No. 449 record supports Cellco's need for a new facility in eastern Redding. The installation of Cellco antennas on the MCM tower at the Property will satisfy a significant portion of Cellco's coverage objectives in the area. The significant benefits

realized in satisfying the need for improved wireless service in this area outweighs the minimal additional environmental impact associated with installation of Cellco's antennas on the proposed tower. Cellco, therefore, respectfully requests that the Council approve the Docket No. 449 Application, and issue a Certificate for this Facility accordingly.

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

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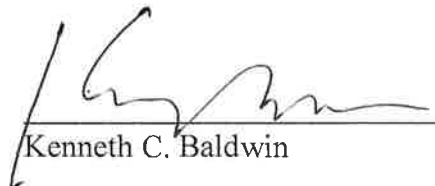
CERTIFICATION

I hereby certify that on this 9th day of October, 2014, a copy of the foregoing was sent, postage prepaid, to the following parties and intervenors:

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