

Docket No. 451  
Homeland Towers, LLC and New Cingular Wireless (AT&T)  
Cheshire, Connecticut  
Responses to Interrogatories for Town of Cheshire

The Town of Cheshire (the "Town") hereby submits its responses to the "questions" submitted to the Town by intervenor Mr. Wassmer:

1. *Can the existing emergency equipment at the WWTP be upgraded without a 180-foot tower? What would be the associated costs?*

**OBJECTION:** The question is premised on statements that are erroneous or otherwise not in evidence in the record of this proceeding. Further, the "associated costs" to the Town of any speculative possibilities are not relevant to the Connecticut Siting Council's statutory consideration of the merits of the Application.

**RESPONSE:** Notwithstanding its objection, the Town responds that its facilities will be located at the highest point on the proposed 170 foot monopole tower. Because the Town has entered into a lease agreement with one of the Applicants, Homeland Towers, that will provide the Town with the technical capabilities to enhance its existing emergency services communications system coverage and to provide also for future enhancements, the Town has no need to go to the time and expense of trying to ascertain any costs for sites and options of developing its own tower solutions.

2. *The Town and AT&T have already entered into a lease as stated on page 2 of the introduction, what are the terms of the lease? Years? Money? Can you please elaborate on the Quid-pro-quo agreement discussed during the public hearing?*

**OBJECTION:** The question is premised on statements that are erroneous or not in evidence in the record of this proceeding. Further, the specific terms of agreement between the Town and Homeland Towers that are referenced in the questions are not relevant to the Council's statutory consideration of the merits of the Application.

**RESPONSE:** Notwithstanding its objection, the Town responds that it does not have a lease with "AT&T". The Option and Ground Lease Agreement between the Town and Homeland Towers is in the record in this proceeding submitted by the Applicants as Attachment 2 to its responses to interrogatories propounded by the Council. The terms of the lease agreement speak for themselves.

3. *Does the Police or Fire Department use repeaters on vehicles currently to improve existing service? Wouldn't that be more prudent than erecting a 180' tower?*

**OBJECTION:** The question is premised on statements that are erroneous or otherwise not in evidence in the record of this proceeding. Further, the question of "prudence" of potential options for the Town is not relevant to the Connecticut Siting Council's statutory consideration of the merits of the Application.

**RESPONSE:** Notwithstanding its objection, the Town responds that it does not use repeaters on vehicles, and based on information that it has confirmed with its consultants, repeaters are an outmoded and inefficient way of trying to enhance existing emergency communications service for the following reasons: (1) Portables radios will not function properly unless a vehicle with a repeater is in close proximity to the portable; (2) Vehicle repeaters require a RF separate channel from the system channel and additional channels are difficult or impossible to license; (3) Multiple repeaters at an emergency or crisis scene can interact and impair communications; (4). The expense of installing and maintaining vehicle repeaters in all town vehicles to support hundreds of portables would be cost prohibitive.

4. *Is the microwave technology absolutely necessary? Is this future technology already funded? What other technologies have been explored? If the Town of Cheshire does not get microwave technology, does it seem financially prudent to invest in new technology that requires Line of Sight from one of the higher areas (Highland Avenue) to one of the lowest areas (Cheshire Street, Quinnipiac Park)? If not, is it in a capital plan? How many years in the future?*

**RESPONSE:** It is the Town's assessment that the transition of its emergency services communications system to utilizing point-to-point transmission is in the best interests of the Town and its emergency services communications. The Town's agreement with the Applicant, Homeland Towers, addresses both the short term and long term needs of the Town's emergency services communications system in a very efficient way.

5. *For planning considerations, I have researched and found that the most ideal locations for this type of technology is mountain peak or ridgeline positions, given this information, would you say that the Quinnipiac Park recreation area is the ideal location for such technology?*

**OBJECTION:** The question is premised on statements that are erroneous or otherwise not in evidence in the record of this proceeding.

**RESPONSE:** Notwithstanding its objection, the Town responds that its agreement with the Applicant, Homeland Towers, addresses both the short term and long term needs of the Town's emergency services communications system in a very efficient way. In

addition, the Town's communications consultant evaluated the height of the tower for purposes of those needs.

6. *Did the Town consider a lower tower in this location and use a repeater on the existing towers along the ridgeline of Meriden Mountain?*

**OBJECTION:** The question is premised on statements that are erroneous or otherwise not in evidence in the record of this proceeding.

**RESPONSE:** Notwithstanding its objection, the Town responds that it is not constructing a tower. Pursuant to its agreement with Homeland Towers, the Town is taking advantage of the proposed 170 foot monopole that will be sited by Homeland Towers on the Wastewater Treatment Plant facility property. In addition, the Town's communications consultant evaluated the height of the tower for purposes of the Town's emergency communications needs.

7. *Since the greatest need here is clearly for emergency service, should the town consider building the tower themselves and leasing the space to cellular service carriers?*

**OBJECTION:** The question is premised on statements that are erroneous or otherwise not in evidence in the record of this proceeding.

**RESPONSE:** Notwithstanding its objection, the Town responds that the Town Council voted overwhelmingly in support of the lease agreement with Homeland Towers and the Town has, pursuant to the Town Council's resolution, executed the agreement. Further, the Town is not in the business of constructing and maintaining wireless communications towers.

8. *Page 9 states that the proposed tower represents an opportunity for the Town to avoid its own capital costs of tower site construction and operational costs. What would the cost of that be?*

**OBJECTION:** The question seeks information that is not relevant to the Council's statutory consideration of the merits of the Application.

**RESPONSE:** Notwithstanding its objection, see response to question 1.