STATE OF CONNECTICUT

CONNECTICUT SITING COUNCIL

APPLICATION BY TOWER HOLDINGS, LLC FOR A CERTIFICATE OF ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED FOR THE CONSTRUCTION MAINTENANCE AND OPERATION OF A WIRELESS TELECOMMUNICATIONS FACILITY AT 199 BRICKYARD ROAD, FARMINGTON, CONNECTICUT	DOCKET NO. 454 March 9, 2015

INTERVENOR NEW CINGULAR WIRELESS PCS, LLC (AT&T) RESPONSES TO THE TOWN OF FARMINGTON INTERROGATORIES

Q11. AT&T is collocated on approximately 50 lattice towers and approximately 200 monopole towers in Connecticut. See AT&T's Interrogatory (set one), Q2. Approximately how many of the 50 lattice towers located in Connecticut has AT&T mounted antennas on for cellular telecommunications purposes within the last ten years (dating back to February 2005)? Approximately how many of the 200 monopole towers located in Connecticut has AT&T mounted antennas on for cellular telecommunications purposes within the last ten years (dating back to February 2005)?

A11. *Providing the number of collocations on lattice towers and monopole towers is not feasible as it would require review of each of the approximately 250 individual records for AT&T's collocation. However, it can be noted that the majority of the approximately 50 collocations on lattice towers and approximately 200 collocations on monopole towers occurred over the last ten years. As noted in other proceedings, when searching for a site to provide service to an area where reliable service is lacking, AT&T first evaluates whether any existing infrastructure can be used to provide needed service.*

Q12. Did AT&T ever request from the Applicant that the design of the proposed tower be a monopole as opposed to a lattice structure?

A12. *No. See AT&T's Responses to the Town's Interrogatories dated January 26, 2015, A1.*

Q13. According to Mr. Savino's testimony from the February 3rd, 2015 hearing (see Vol. I, page 36, lines 18-25, page 37, lines 1-2), the Applicant first determined that it needed a training facility, and, thereafter, found a carrier, AT&T, to locate onto its proposed tower to satisfy the Siting Council's process. When was AT&T contacted by the Applicant? By whom?

A13. *As stated by Mr. Regulbuto at the February 23, 2015 hearing (2/24/15 Tr. 3pm, pg. 81-82), Mr. Regulbuto met with AT&T in January of 2013 to discuss his general plans for facility development. Approximately two months later in mid-March of 2013, Mr. Regulbuto provided AT&T's representatives with details regarding the proposal at the subject site. AT&T's RF engineers reviewed this information and determined that a facility on Tower Holdings proposed tower would meet AT&T's coverage objectives for its search ring (S3393) in this area of Farmington.*

Q14. For approximately how long prior to being contacted by the Applicant was AT&T experiencing substandard service in the alleged underserved area?

A14. *There is no specific length of time that this gap in reliable coverage has existed. We know of no previous facility in this area that was decommissioned, so it is reasonable to assume that the area constituting the current gap has never had reliable digital cellular service from AT&T.*

Q15. Explain in detail the nature of the substandard service.

A15. *Reliable wireless service is lacking within the area of the gap shown in the coverage plots. The measured signal levels within this area are below AT&T's design criteria (-83 and -93 dBm for 700 MHz, -86 and -96 dBm for 1900 MHz) for reliable wireless service.*

Q16. Did AT&T take any actions to improve service in the alleged underserved area other than its potential collocation on the Tower Holdings proposed lattice tower? If yes, what were those actions?

A16. *Efforts have been made to optimize the coverage of surrounding sites in the current existing AT&T network. The existing sites are currently configured to provide as much coverage to this area as possible.*

Q17. If the Siting Council denies the Applicant's application in its entirety, will AT&T seek permission from the Siting Council to construct a different facility in the Farmington area that would serve the alleged underserved area?

A17. *At this time, AT&T does not have any plans for a proposed facility to serve this area of Farmington other than the location proposed in this docket.*

Q18. Has AT&T ever applied to the Connecticut Siting Council to mount an antenna and/or construct a telecommunications tower in order to serve the same approximate number of customers that AT&T's proposed antenna will serve if mounted on the proposed tower? If so, please provide these tower locations and the approximate number of customers that AT&T's antennas at these tower locations serve.

A18. *The location and configuration of the surrounding sites in the existing AT&T network and other factors including, but by no means limited to, variations in terrain, roads,*

population distribution, site availability, tree cover and land use (clutter) render any such comparison from site to site invalid.

Q19. Did AT&T go into the field and test the signal strength in the alleged underserved area?

A19. *AT&T conducted measurements of existing data using scanning receivers and reference antennas mounted on vehicles ("drive data"). Data was collected by laptop computers connected to these scanning receivers. Plots of these drive data clearly demonstrating the gap in reliable coverage are included in Attachment 1.*

Q20. Did AT&T calculate the signal strength in the alleged underserved area theoretically?

A20. *In addition to the measured data referenced in the response to Question 19, AT&T also calculated overall existing coverage based on the results of those tests. Those predictions are reflected in the plots submitted in this proceeding.*

Q21. Please provide the calculations demonstrating AT&T's need to place antennas at 140 feet at the proposed location.

A21. *In order to establish the necessary height for this site, AT&T conducted transmitter tests at heights of 170', 140' and 110' AGL (above ground level) at the proposed tower location, collecting data in the same manner as referenced in the response to Question 19. The plots of these test results included in Attachment 1 demonstrate AT&T's need to mount antennas at least 140' AGL to provide reliable service to this area of Farmington.*

CERTIFICATE OF SERVICE

I hereby certify that on this day, fifteen copies of the foregoing were sent electronically and by overnight mail to the Connecticut Siting Council and:

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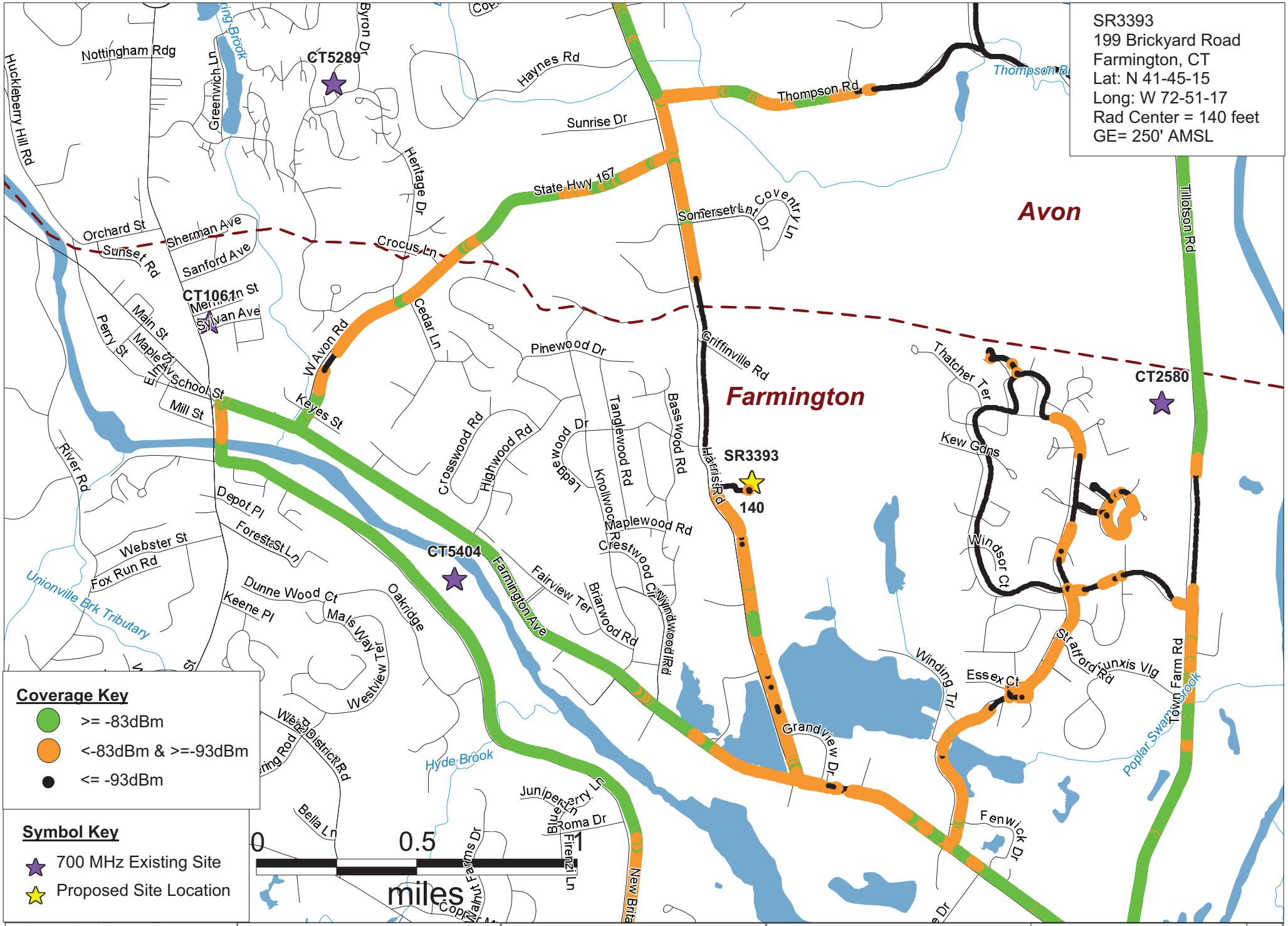
Dated: March 9, 2015

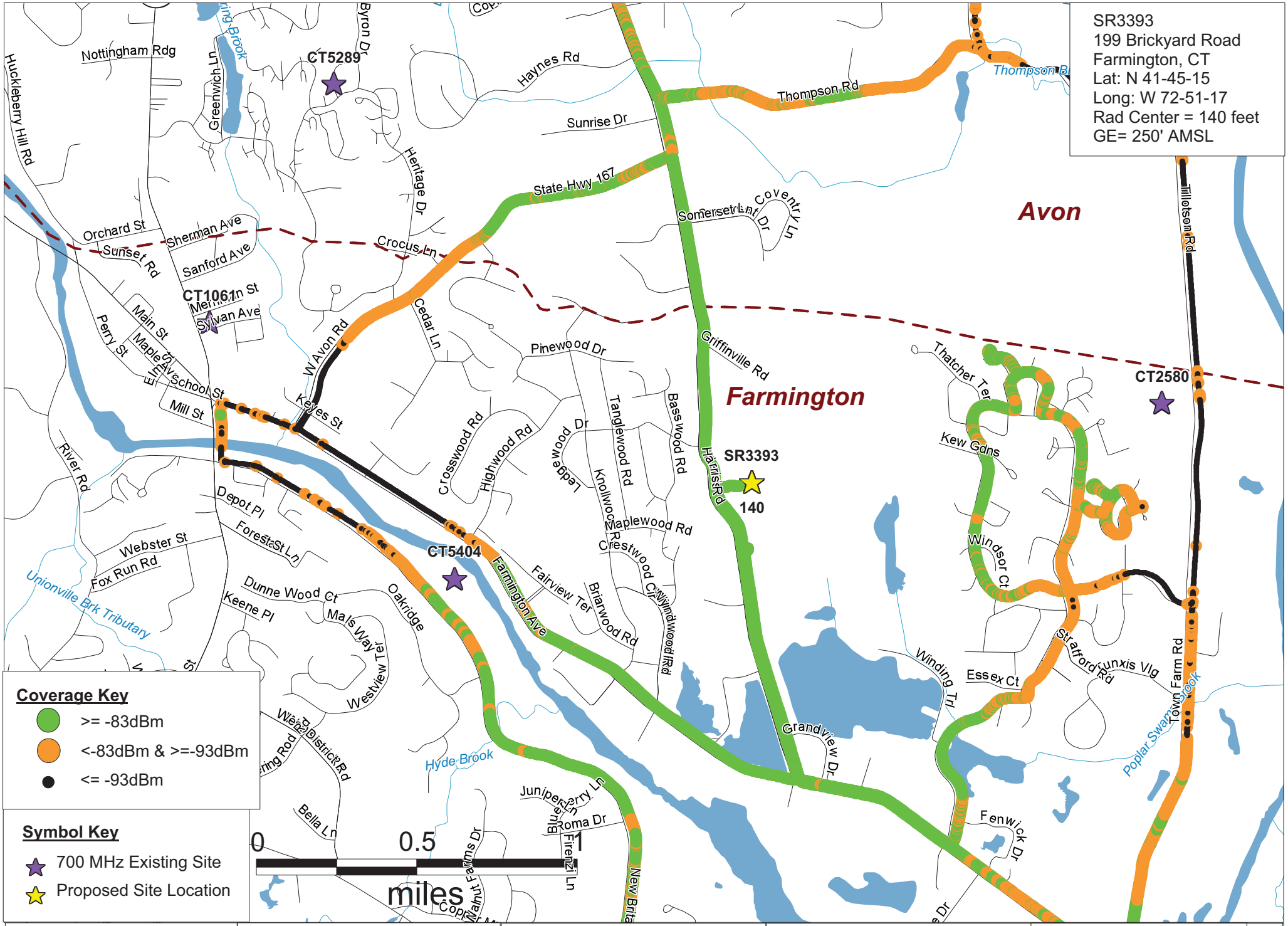
Lucia Chiocchio

cc: Jessica Rincon, AT&T
Adam Braillard, Smartlink
Martin Lavin, C Squared Systems
Christopher B. Fisher, Esq.

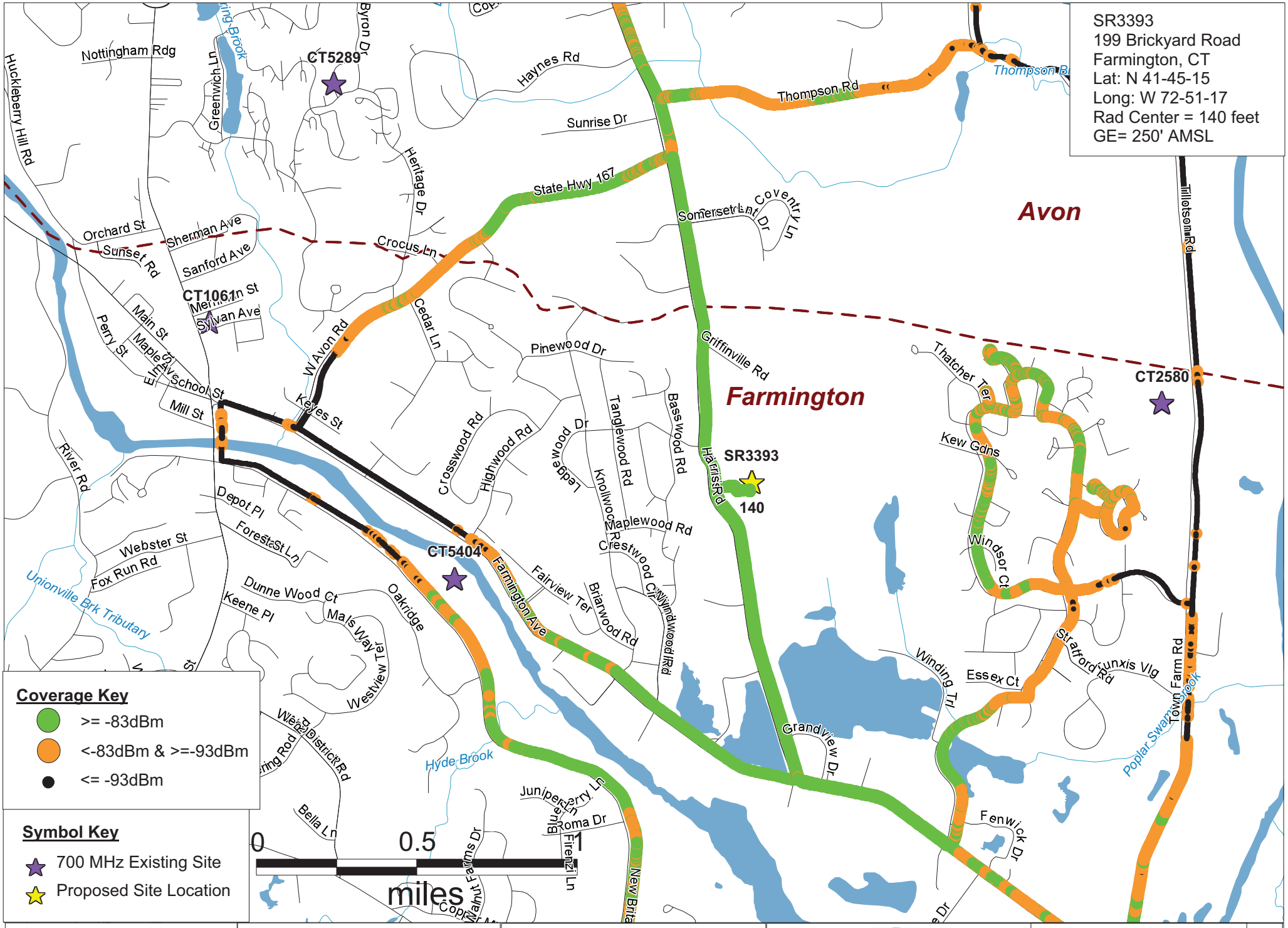
ATTACHMENT 1

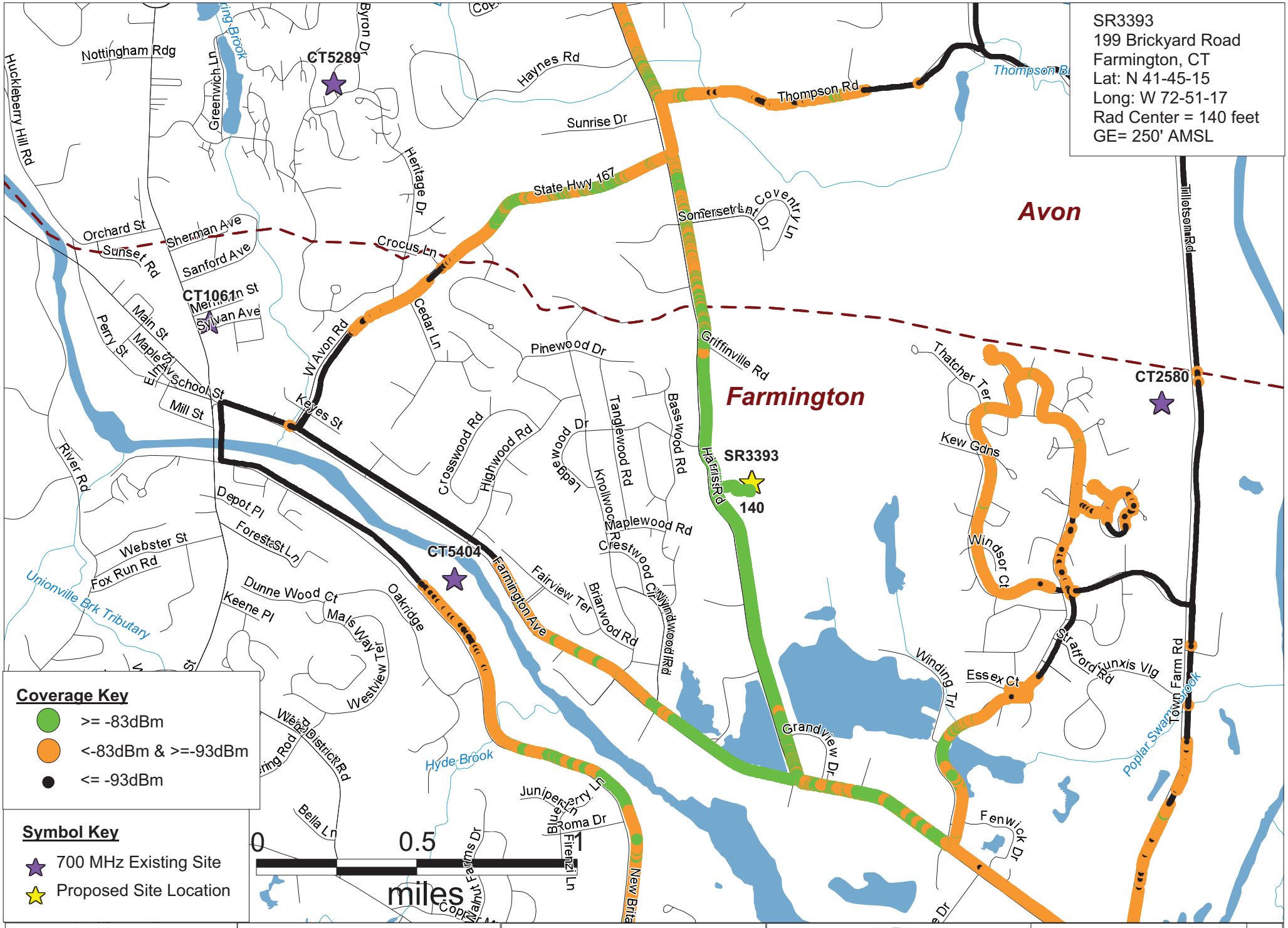


Existing Coverage 700 MHz LTE	SR3393 Farmington, CT	199 Brickyard Road Farmington, CT	at&t	PREPARED ON DATE: 03/03/2015 REV 0



700 LTE CW @170	SR3393 Farmington, CT	199 Brickyard Road Farmington, CT	at&t	PREPARED ON DATE: 03/03/2015 REV 0


SR3393
199 Brickyard Road
Farmington, CT
Lat: N 41-45-15
Long: W 72-51-17
Rad Center = 140 feet
GE= 250' AMSL
Avon
Farmington
CT5289
CT1061
CT5404
CT2580
SR3393
140
Coverage Key
>= -83dBm
<-83dBm & >=-93dBm
<= -93dBm
Symbol Key
700 MHz Existing Site
Proposed Site Location
0
0.5
1
miles
700 LTE CW @140
SR3393
Farmington, CT
199 Brickyard Road
Farmington, CT
at&t
PREPARED ON
DATE: 03/03/2015
REV
0



700 LTE CW @110	SR3393 Farmington, CT	199 Brickyard Road Farmington, CT	at&t	PREPARED ON DATE: 03/03/2015	REV 0