

**STATE OF 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 LOCATED AT
199 BRICKYARD ROAD, FARMINGTON, CT

DOCKET NO. 454

January 20, 2015

**PRE-HEARING INTERROGATORIES OF THE
TOWN OF FARMINGTON TO APPLICANT**

The following interrogatories are directed to Tower Holdings, LLC (the "Applicant") by the Town of Farmington ("Party"):

1. The Application for Certificate of Environmental Compatibility and Public Need (the "Application") provides that "a monopole structure is insufficient for training purposes." Application, at 7. Is it also the Applicant's contention that a monopole structure is insufficient for AT&T to achieve its coverage objectives in the alleged underserved area?
2. Has the Applicant considered using a monopole structure as opposed to a lattice structure at the proposed location? If not, why?
3. Please identify the size of the search ring and explain why that radius was chosen.
4. What other locations on the proposed parcel were considered that would have a less significant impact on the residential area and why were they rejected?
5. The Application states that "only 3 percent of the Study Area would have year round views of portions of the Facility" and that "an additional 3 percent of the Study Area would have seasonal (leaf-off) views of the proposed Facility." Application, at 14. Please explain how these calculations were made.
6. The Application, Attachment 11, page 7 provides that Winding Trails (located southeast of the proposed facility) will have year round views of the proposed facility. How will the Applicant minimize the aesthetic and environmental impacts on this location?
7. How many residences (as opposed to acres) will have year round views of the proposed tower?
8. How many residences (as opposed to acres) will have seasonal views of the proposed tower?

Respectfully Submitted,

Party, Town of Farmington

By: 

Kelly C. McKeon
Duncan J. Forsyth
Kenneth R. Slater, Jr.
Halloran & Sage, LLP
One Goodwin Square
225 Asylum Street
Hartford, CT 06103
Its Attorneys

CERTIFICATION

I certify that on this 20th day of January, 2015, fifteen copies of the foregoing were sent by regular and electronic mail to the Connecticut Siting Council and by electronic mail to:

Counsel for Tower Holdings, LLC ("Applicant")

Jesse A. Langer, Esq.
Updike, Kelly & Spellacy, P.C.
265 Church Street
New Haven, CT 06510
(203) 786-8300
JLanger@uks.com

Counsel for AT&T

Christopher B. Fisher
Lucia Chiocchio
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601
cfisher@cuddyfeder.com
lchiocchio@cuddyfeder.com



Kelly C. McKeon, Esq.