

**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 AT&T**

The following interrogatories are directed to AT&T by the Town of Farmington ("Party"):

1. Has AT&T considered using a monopole structure as opposed to a lattice structure at the proposed location? If not, why?
2. How many lattice telecommunication towers has AT&T mounted antennas on in Connecticut in the last ten years (dating back to January 2005)? How many monopole telecommunication towers has AT&T mounted antennas on in Connecticut in the last ten years (dating back to January 2005)?
3. Would AT&T be able to achieve their coverage objectives in the alleged underserved area if a monopole structure were used instead of a lattice structure at the proposed site? If not, why?
4. The Application provides that "[t]here are no other practicable or feasible alternatives to the macro site proposed in this Application. Distributed antenna systems (DAS), repeaters, small cells and other types of transmitting technologies are not a suitable means by which to provide service within the sizeable coverage gap presented in this Application." Application, at 10-11. Acknowledging that the listed technologies may be better suited in other contexts, please provide evidence why these technologies are entirely ill-suited for providing the desired coverage.
5. The Application provides that "[t]here are no other structures that AT&T could use to alleviate the existing coverage gap." Application, at 11. During the site search, did AT&T consider the rooftop structure located at Acme Auto, 1371 Farmington Avenue, as a possible location to co-locate with Verizon, which currently has an antenna on this structure? Attachment 7. Would this rooftop structure enable AT&T to achieve the desired coverage? If not, why?
6. If AT&T were to co-locate on the rooftop structure located at Acme Auto, 1371 Farmington Avenue, how many residential wireless customers could AT&T serve?

7. 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?
8. Does AT&T possess any data on dropped calls, customer complaints, and/or ineffective attempts in the vicinity of the proposed facility? If so, what do they indicate? Does AT&T have any other indicators of substandard service in this area?
9. Please identify how many other future sites will be necessary, at a minimum, to accomplish adequate coverage for the target municipality.
10. Please identify any sites, in addition to the proposed facility, on which AT&T intends to seek permission from the Siting Council to construct or modify a facility in the Farmington area.

Respectfully Submitted,

Party, Town of Farmington

By:  \_\_\_\_\_

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**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 AT&T**

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