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***VIA FEDERAL EXPRESS AND  
ELECTRONIC MAIL***

Ms. Melanie A. Bachman, Esq., Executive Director  
Connecticut Siting Council  
Ten Franklin Square  
New Britain, CT 06501

**Re: Docket No. 454 – Application by Tower Holdings, LLC for A Certificate of Environmental Compatibility and Public Need for A Telecommunications Facility at 199 Brickyard Road, Farmington, Connecticut**

Dear Attorney Bachman:

This office represents Tower Holdings, LLC (“Tower Holdings”), the applicant in the above-captioned docket. Tower Holdings respectfully submits the following written comments concerning the Draft Findings of Fact by the Connecticut Siting Council, dated May 29, 2015.

**Finding of Fact No. 21.**

The Applicant first approached the Town in regards to constructing a tower for training purposes in March 2013. The Applicant intended to make an informal presentation before the Planning and Zoning Commission on April 9, 2013 and prepared an information packet that contained a visibility analysis for a 180-foot training tower without antenna arrays for the presentation. The Applicant withdrew from the meeting on April 9, 2014, stating to the Town that windy weather precluded necessary testing prior to the meeting. The Applicant also withdrew after determining AT&T was interested in locating on the facility. AT&T, **which had expressed its interest in early March 2013, at that time, did had** not reviewed the site in detail so a co-location height was not known. (Town 2, Town 3, Town 4; Town 5; AT&T 6, response 13; Tr. 1, pp. 34-35, 81-82, 90-92; Tr. 3, pp. 2287-230)

**Finding of Fact No. 48.**

The proposed site is located on an approximate 2.5-acre parcel owned by **Farmington River Properties, LLC** ~~NEF~~. The property is developed with a commercial building and an associated storage yard. (Applicant 1, p. 6, Tab 1, Tab 12 aerial photographs; Applicant 3, response 8, **Applicant 11**)

**Finding of Fact No. 65(c).**

Private entities that would locate on the proposed tower include the following:

...

- c) WBMW Radio – seeks to install a 5-foot antenna at 175 feet. WBMW would **need a location at the top of the facility.** ~~like to locate at a minimum tower height of 100 feet agl.~~

(Applicant 1, p. 2, Tab 1; Applicant 3, response 5; Applicant 11, part 3; Tr. 3, pp. 210-214)

Note: The transcript at page 213 is inaccurate.

**Finding of Fact No. 68.**

A gin pole is a narrow lattice pole used as a vertical crane to maintain and construct lattice towers. The Applicant would utilize gin poles up to 80 feet in length to lift equipment that could weigh up to 850 pounds. **The Applicant could use a gin pole smaller than 80 feet for training purposes.** (Applicant 1, pp. 7-8; Tr. 1, pp. 19, 57-59, 109-114)

**Finding of Fact No. 69.**

**As proposed,** ~~o~~Once installed, a gin pole could extend above the existing tower up to 19 feet ~~to~~ for proper use but still be under 200 feet agl to avoid Federal Aviation Administration (FAA) hazard criteria. **The Applicant is willing to limit the height at which the gin pole extends above the top of the existing tower or utilize the gin pole such that it does not extend above the top of the existing tower.** (Applicant 1, pp. 7-8; Tr. 1, pp. 19-22, 57-59, 109-114)



**Finding of Fact No. 70**

The Applicant would conduct training Monday through Friday during four separate, one-week intervals during warm weather months, **which consist of leaf-on conditions.** (Tr. 1, pp. 46-47; Tr. 3, pp. 188-189)

**Finding of Fact No. 71**

The temporary **training equipment, consisting of non-operational antennas and a gin pole,** ~~lattice tower sections~~ would be affixed to the permanent tower for several days. (Tr. 1, pp. 95-96, 100; Tr. 3, p. 189)

**Finding of Fact No. 73**

**Neither** AT&T's equipment **nor the equipment of any future carrier** would ~~not~~ be an impediment to the training exercises. (Tr. 1, p. 20; Tr. 3, p. 189)

**Finding of Fact No. 110**

The Applicant would be willing to accept a 140-foot lattice tower as it could be designed without tapering at the upper sections in order to accommodate the use of a gin pole. **An additional alternative configuration would include using t**~~The gin pole would be used~~ during training to raise 20-foot tower sections to the top, affixing the temporary tower sections to the permanent tower, then dismantling and lowering the temporary tower sections. The temporary tower section would reach a height of 180 feet agl during training. (Tr. 3, pp. 207-209, 225, **233-2345**)

In accordance with § 16-50j-12 of the Regulations of Connecticut State Agencies, I have enclosed an original and fifteen (15) copies of Tower Holdings' written comments.

If you have any questions concerning this filing, please do not hesitate to contact me.

Very truly yours,



Jesse A. Langer

Enclosures

cc: *Service List (via regular mail and electronic mail)*

