

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
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 :
 APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 456
 D/B/A VERIZON WIRELESS FOR A :
 CERTIFICATE OF ENVIRONMENTAL :
 COMPATIBILITY AND PUBLIC NEED FOR :
 THE CONSTRUCTION, MAINTENANCE :
 AND OPERATION OF A WIRELESS :
 TELECOMMUNICATIONS FACILITY AT :
 33 KEEGAN ROAD, PLYMOUTH, :
 CONNECTICUT : APRIL 13, 2015

PRE-HEARING SUBMISSION OF
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby provides the Connecticut Siting Council (“Council”) with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

1. Tony Befera, Manager-Real Estate & Project Implementation, Cellco Partnership
2. Mark Brauer, Radio Frequency Engineer, Cellco Partnership
3. Carlo F. Centore, P.E., Centek Engineering, Inc.
4. Michael Libertine, LEP, Director of Siting and Permitting, All-Points Technology Corp. P.C.
5. Dean Gustafson, Senior Wetland Scientist and Professional Soil Scientist, All-Points Technology Corp. P.C.
6. Alex Tyurin, Real Estate Consultant for Cellco Partnership

B. Exhibits to be offered

Cellco intends, at this time, to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by Cellco Partnership d/b/a Verizon Wireless dated February 13, 2015, including attachments and the following bulk file exhibits:
 - a. Plymouth Zoning Regulations;
 - b. Plymouth Plan of Conservation and Development;
 - c. Plymouth Inland Wetlands and Watercourses Regulations; and
 - d. Cellco's "Technical Report" dated May 14, 2014, filed with the Town of Plymouth.
2. Affidavit of Publication from the Bristol Press for notices published February 2 and 3, 2015.
3. Cellco's Responses to Pre-Hearing Interrogatories (Set 1) from the Council dated April 6, 2015.
4. Sign Posting Affidavit dated April 9, 2015.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By:  _____

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Its Attorneys