

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
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 APPLICATION OF MESSAGE CENTER : DOCKET NO. 458
 MANAGEMENT, INC. FOR A CERTIFICATE :
 OF ENVIRONMENTAL COMPATIBILITY :
 AND PUBLIC NEED FOR THE :
 CONSTRUCTION, MAINTENANCE AND :
 OPERATION OF A WIRELESS :
 TELECOMMUNICATIONS FACILITY AT :
 62-64 CODFISH HILL ROAD, BETHEL, :
 CONNECTICUT : AUGUST 6, 2015

**POST-HEARING BRIEF OF INTERVENOR
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS**

Introduction

On March 19, 2015, Florida Tower Partners, LLC d/b/a North Atlantic Towers (“NAT”) filed an application (“Application”) with the Connecticut Siting Council (“Council”) for a certificate of environmental compatibility and public need (“Certificate”) for the construction, maintenance and operation of a wireless telecommunication facility at one of two locations on a 49-acre parcel at 62-64 Codfish Hill Road in Bethel, Connecticut (the “Property”). At Site 1, located in the easterly portion of the Property, NAT proposed to construct a 150-foot monopole tower. At Site 2, located in the center of the Property, NAT proposed to install a 170-foot monopole tower. Equipment associated with either proposed tower would be installed near the base of the tower within a fenced facility compound. (Applicant’s Exhibit (“Exh.”) 1).

On April 17, 2015, New Cingular Wireless PCS, LLC (“AT&T”) was granted intervenor status in Docket No. 458. AT&T planned to install its antennas at the 150-foot level on the Site

1 tower or the 170-foot level on the Site 2 tower. On June 26, 2015, prior to the close of the public hearing on Docket No. 458, AT&T filed a Notice of Withdrawal with the Council.¹

On May 14, 2015, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) filed a petition to intervene in Docket No. 458. (Cellco Exh. 1). Cellco identified this cell site as its “Bethel East Facility”. The Council granted Cellco intervenor status on May 14, 2015. At the time it was granted intervenor status, Cellco was planning to install its antennas at the 140-foot level on the Site 1 tower and 160-foot level on the Site 2 tower, each location ten (10) feet below the AT&T antennas. Following AT&T’s withdrawal from this proceeding, Cellco determined that the maximum antenna height it could justify at the Property was 120 feet above ground level (AGL) at Site 1 and 150 feet AGL at Site 2.

The Council conducted an evidentiary and public hearing on the Application on June 2, 2015 (June 2, 2015 Hearing Transcript (“Tr. 1”), p. 4). The hearing was continued to July 14, 2015. (July 14, 2015 Hearing Transcript (“Tr. 2”), p. 4). This post-hearing brief is filed on behalf of Cellco pursuant to Section 16-50j-31 of the Regulations of Connecticut State Agencies (“R.C.S.A.”) and the Council’s directives. (Tr. 2 p. 114).

Cellco’s Need for the Proposed Bethel East Facility

Cellco established a search ring for its Bethel East Facility in 2013. Due to budget constraints in place at that time, Cellco did not commence a formal site search for a tower site in the area. (Cellco Exh. 2, Q. 10). Cellco needs the proposed Bethel East Facility to fill existing gaps in wireless service along portions of State Routes 302 and 58 in eastern Bethel and portions

¹ Notwithstanding its withdrawal from the Docket No. 458 proceeding, AT&T continues to have a need for wireless service in eastern portions of Bethel and western portions of Newtown and anticipates using the proposed facility, if approved, at some point in the future. (Admin. Record – AT&T Notice of Withdrawal of Intervention dated June 26, 2015).

of western Newtown and northern Redding. These gaps in wireless service along Route 302, for example, range from 0.65 mile at 700 MHz to 1.7 miles at 2100 MHz. Along Route 58, the wireless service gaps range from 0.1 miles at 700 MHz to 0.65 miles at 2100 MHz. Similar gaps exist along secondary roads (Old Hawleyville Road and Plumtrees Lane) and in residential areas around the Property. (Cellco Exh. 2, Q. 5; Cellco Exh. 3, Q. 2; Cellco Exh. 4, Q. 5). Coverage from Cellco's nearest adjacent sites in Bethel and Newtown, Connecticut cannot fill these existing gaps in service. Coverage from the proposed Bethel East Facility (either from Site 1 or Site 2) would eliminate the coverage gaps at 700 MHz and 850 MHz entirely, and significantly reduce the size of the coverage gaps at 1900 MHz and 2100 MHz. (Cellco Exh. 2, Q. 5; Cellco Exh. 3 Q. 2; Cellco Exh. 4, Q. 5).

In addition to the coverage benefits, the Bethel East Facility would provide capacity relief to Cellco's existing Bethel cell site. System performance data indicates that the Alpha sectors antennas at Cellco's adjacent Bethel cell site (that sector of antennas directed toward the Property), has been operating beyond its existing capacity limits (a/k/a exhausting) for more than a year resulting in an overall reduction in the reliability of service in the area. (Cellco Exh. 3, Q. 3; Tr. 2, pp. 98-110).

Cellco's Radio Frequency (RF) engineers have determined that it can satisfy its wireless service objectives in the area around the Property by installing antennas at a minimum height of the 120 feet AGL on the monopole tower at Site 1 or the 150 feet AGL on the monopole tower at Site 2. (Cellco Exh. 4, Q. 5).

Cellco's Proposed Facility Installation

Cellco would install twelve (12) antennas and nine (9) remote radio heads on a low profile antenna platform at the 120-foot level on the Site 1 tower or the 150-foot level on the Site

2 tower. (Cellco Exh. 4, Q. 5). Equipment associated with Cellco's antennas and a 35 kW diesel generator would be located inside a 12' x 26' shelter located within the proposed facility compound at either Site 1 or Site 2. (Cellco Exh. 2, Q. 12; Tr. 2, p. 96).

The proposed Cellco Bethel East Facility will support Text-to-911 service as soon as the local Public Safety Answering Point (PSAP) is capable of receiving that service, and would comply with the intent of the "Warning Alert and Response Network Act of 2006. (Cellco Exh. 2, Q. 7 and Q. 8).

Conclusion

The evidence in the Docket No. 458 record supports Cellco's need for a Bethel East Facility. The installation of Cellco antennas on the NAT tower at either the Site 1 or Site 2 locations on the Property would satisfy Cellco's wireless service objectives in the area. Cellco, therefore, respectfully requests that the Council approve the Docket No. 458 Application.

Respectfully submitted,
CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By 

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CERTIFICATION

I hereby certify that on this 6th day of August, 2015, a copy of the foregoing was sent,
postage prepaid, to the following parties and intervenors:

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