



SHIPMAN & GOODWIN LLP®
COUNSELORS AT LAW

Matthew Ranelli
Phone: (860) 251-5748
Fax: (860) 251-5318
mraneli@goodwin.com

June 16, 2015

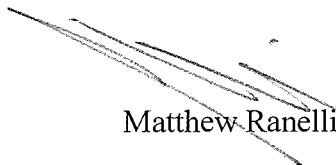
Ms. Melanie Bachman
Acting Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 459: Application of Message Center Management, Inc. (MCM) and New Cingular Wireless (AT&T) For Certificate of Environmental Compatibility and Public Need For Construction, Maintenance, and Operation of a Telecommunications Tower Facility in Glastonbury, Connecticut

Dear Ms. Bachman:

Pursuant to the Pre-Hearing Schedule agreed upon at the May 27, 2015 pre-hearing teleconference, the Intervenor Town of Glastonbury respectfully submits the following Interrogatories to be answered by the Petitioners Message Center Management Inc. and New Cingular Wireless PCS.

Sincerely,



Matthew Ranelli

GMR:ekf
Enclosure

c: Message Center Management, Inc.
New Cingular Wireless PCS, LLC
Town of Glastonbury

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF MESSAGE CENTER
MANAGEMENT, INC. (MCM) AND NEW CINGULAR
WIRELESS (AT&T) FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND PUBLIC
NEED FOR THE CONSTRUCTION, MAINTENANCE,
AND OPERATION OF A TELECOMMUNICATIONS
TOWER FACILITY IN GLASTONBURY,
CONNECTICUT

DOCKET NO. 459

JUNE 16, 2015

PRE-HEARING INTERROGATORIES
FROM INTERVENOR TOWN OF GLASTONBURY

Pursuant to the Pre-Hearing Schedule agreed upon at the May 27, 2015 pre-hearing teleconference, the Intervenor Town of Glastonbury respectfully submits the following Interrogatories to be answered by the Petitioners Message Center Management Inc. ("MCM") and New Cingular Wireless PCS (hereafter "AT&T").

1. Please clarify your response to the Siting Council's May 20, 2015 Pre-Hearing Questions No. 2 to provide the number of certified notices sent and the number of mail receipts received.
2. Petitioners' response to Siting Council's May 20, 2015 Pre-Hearing Questions No. 7 indicates that "compound space and lease area are limited." Have the Petitioners evaluated whether the space is adequate for planned or foreseeable collocated carriers and their likely needs and if so, please describe the evaluation or its results including the number of future carriers the proposed tower could accommodate and the portion of compound space available for them.
3. If construction occurs during the winter season, how will the turtle management plan address the need to locate and protect turtles during the cold or winter months?
4. Given the Petitioners' concession that the area is dominated by smaller residential parcels and the high number of existing residential homes that are impacted by the view of the proposed tower both seasonally and year-round, why haven't the Petitioners expended more effort in its site search seeking coverage in this area using small cell wireless technology as discussed in Cellco's May 7, 2015 letter in this docket?
5. Please indicate whether small cell wireless technology was evaluated to cover a similar coverage area to that indicated on the RF maps for existing, approved, and proposed

facilities at 700 MHz (Attachment 1 of Petitioners' Application) and at 850 MHz (Attachment 8 of Petitioners' Response to May 20 Pre-Hearing Questions).

6. Please provide RF maps showing the results of any small cell wireless coverage option that was analyzed and provide a comparison of the gap area that could be covered by such option compared with the proposed tower at each frequency AT&T intends to use at the site that details (a) the percentage of the gap area that could be covered by the small cell technology option and (b) the location of any area that would lack coverage (if any).

7. Has AT&T ever used similar small cell wireless technology to address coverage gaps that involved predominately small parcel residential neighborhoods in Connecticut?

8. If the answer to the prior Interrogatory is "yes," please provide a list of representative examples and short description.

9. With regard to the visibility study, please explain whether the 60 foot canopy was presumed for purposes of the computer model in every instance in which the aerial photography shows a tree or trees.

10. Please indicate whether MCM or AT&T makes any additional effort to "fact-check" or "true-up" the canopy assumption when proposing towers in areas that are by its own characterization "predominantly residential" and indicate whether or what such efforts were made in this instance especially along the residential areas most impacted by the proposed tower.

11. Please provide the addresses or locations of the 30 homes that will be burdened with year-round views of the proposed tower.

12. Did the Petitioners seek permission to access residential private property in closest proximity to or most impacted by the proposed tower (*e.g.*, Tarrybrook Drive and Twelve Acre Lane – other than the three homes shown on Photos 10 and 11) during the balloon test?

13. Were any of the photographs in the visibility study taken while seated in an automobile?

14. Please provide the addresses of the additional 70 homes that will be burdened with seasonal views of the proposed tower.

15. The "Viewshed Map – Aerial Base" provided in Attachment 8 of the Application shows an area directly south of the proposed tower that is not shaded as predicted visibility but contains a dot (#9) indicating seasonal visibility. Please indicate whether that acreage is included in the 119 acres impacted by seasonal visibility and explain.

16. Given the residential character of the area and the lack of interest in this proposed tower site by at least one other major carrier, have the Petitioners contacted Cellco and other carriers since May 7, 2015 to further investigate collaboration with them for an alternative to develop a more system strategy for addressing any coverage gaps in this small residential area?

17. If not already provided in response to Interrogatory No. 6 above, please provide radio frequency data for Seven J's Farm as a rooftop location and technical analysis of its viability as a rooftop location when combined with other rooftop locations and existing towers.

18. With respect to weekly generator testing, what is the duration of each weekly test; what are the noise levels at the three nearest residential properties; and what are the mitigation measures to minimize generator noise?

19. What is the percentage MPE at the base of the tower with all four arrays?

20. Please describe whether the use of the Seven J' Farm was evaluated for its use as a part of a fly over stop for migratory bird or a habitat for other avian populations.

21. Please indicate how you have considered alternative routes for utilities and access to the compound that would avoid the wetlands altogether.