STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:	:	
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APPLICATION OF TARPON TOWERS II, LLC	:	DOCKET NO. 486
FOR A CERTIFICATE OF ENVIRONMENTAL	:	
COMPATIBILITY AND PUBLIC NEED FOR	:	
THE CONSTRUCTION, MAINTENANCE AND	:	
OPERATION OF A TELECOMMUNICATIONS	:	
FACILITY LOCATED AT 796 WOODIN	:	
STREET, HAMDEN, CONNECTICUT	:	NOVEMBER 20, 2019

POST HEARING BRIEF OF THE INTERVENOR
CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless ("Cellco") hereby submits its post-hearing brief in support of the application by Tarpon Towers II, LLC ("Tarpon" or "Applicant") for the construction, operation and maintenance of a new telecommunications facility in Hamden, Connecticut (the "Tarpon Application"). For the reasons discussed more fully below, Cellco, an intervenor in this proceeding, respectfully requests that the Siting Council ("Council") approve the Application and issue a Certificate of Environmental Compatibility and Public Need ("Certificate") in Docket No. 486.

Background

On July 12, 2019, Tarpon filed an application with the Council for a Certificate to construct a wireless telecommunications facility in the southerly portion of a 6.75-acre parcel at 796 Woodin Avenue in Hamden, Connecticut (the "Property"). The Property is owned by Gabrielle Scirocco and is used for residential and agricultural (large animal rescue) purposes. (Tarpon 1, p. 2).

Cellco identified a need for a new cell site in southwest Hamden more than thirteen years

ago when it participated in Council Docket No. 310 in 2006.[1] (Cellco 2, Response 6). Cellco reactivated its search area in southwest Hamden in 2015, and agreed to join with Tarpon as the anchor tenant in Docket No. 486 earlier this year. (Cellco 1). Cellco was granted intervenor status in Docket No. 486 on August 15, 2019, and actively participated in this proceeding. Cellco's sole purpose for intervening in this docket was to demonstrate its need for the Tarpon telecommunications facility at the Property.[2] (Cellco 1).

Facility Description

Tarpon proposes to construct a 120-foot monopole tower within a 75-foot by 75-foot leased area and a 70-foot by 70-foot fenced and secure facility compound in the southerly portion of the Property. (Tarpon 1, pp. 2-3 and 6-7, Exhibit E). The southerly portion of the Property is undeveloped and heavily wooded. (Tarpon 1, p. 4, Exhibit H). Access to the tower site would extend from Woodin Avenue along a new gravel access driveway constructed along the westerly Property boundary, adjacent to the Wilbur Cross Parkway. (Tarpon 1, Exhibit E).

Cellco proposes to install antennas and remote radio heads on an antenna platform at a centerline height of 120 feet above ground level ("AGL") on the Tarpon tower. The top of Cellco's antennas would extend to a height of 124 feet AGL. Cellco's radio equipment and a 30-kW propane-fueled backup generator would be located on a concrete pad within the fenced compound. A 500-gallon propane tank would also be installed on a concrete pad in the northeast corner of the fenced-compound. (Tarpon 1, pp. 2, 6-7, Exhibit E).

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[1] The Docket No. 310 application proposed a new tower at 190 Wintergreen Avenue in Hamden. The Docket No. 310 application was withdrawn by Omnipoint Communications Inc. in April of 2006. (Admin. Record).

[2] In addition to Cellco, T-Mobile has also executed a lease with Tarpon to share the proposed tower if the site is approved by the Council. (9/19/19 Tr. 8, p. 24).

Cellco's Need for the Tarpon Tower

Since 1987, Cellco has provided wireless service to portions of southwest Hamden from the Beta sector antennas of a telecommunications facility on West Rock Ridge at 1055 Wintergreen Avenue, in Hamden (Cellco's "Hamden Cell Site"). (Tarpon 1, pp. 15-16). The West Rock Ridge tower was approved by the Council in Docket No. 56 on April 14, 1986. (Tarpon 1, pp. 1-3, 15-16).[3]

Due to its relatively high ground elevation (445 feet above mean sea level ("AMSL")) and Cellco's antenna height of 170 feet AGL (610 feet AMSL), Cellco's Hamden Cell Site (Beta sector antennas) provides service to a large geographic area in southwest Hamden. This large service area was a significant benefit to Cellco's network in the early years of wireless service in Connecticut. (Tarpon 1, pp. 1, 15-16). Cellco's network in Hamden and throughout Connecticut has, however, evolved dramatically since 1987, moving away from fewer tower sites at higher ground elevations, toward more numerous cell sites at lower ground elevations. This evolution allowed for the network and Cellco's fast-growing customer base to benefit from improvements in wireless coverage and significant enhancements to cell site capacity. (Tarpon 1, pp. 7, 15-16, Exhibit F; Cellco 2, Response 3, Response 4 and Response 5).

As the network evolved, service from Cellco's Hamden Cell Site (Beta sector antennas) has become more problematic by causing interference with Cellco's existing Hamden 4, New Haven North 2 and Hamden 2 cell sites. (Tarpon 1, p. 2; Cellco 2 Response 1; 10/22/19 Tr., pp.

[3] The West Rock Ridge tower is currently owned by SBA Communications ("SBA"). SBA was granted intervenor status in the Docket No. 486 proceeding and briefly participated in the initial evidentiary hearing on September 19, 2019. (SBA 1; 9/19/19 Tr., pp. 6-11). SBA withdrew as an intervenor in this docket on October 16, 2019, following discussions with the Applicant and Cellco. (SBA's Withdrawal of Intervenor Status).

15-17). This interference results in a significant disruption of voice and data services and a reduction in cell site capacity, resulting in dropped calls, and a significant degradation of Cellco's wireless service in all of its operating frequencies. (10/22/19 Tr., pp. 14-18). In order for the network to operate more efficiently in southwest Hamden, Cellco needs to eliminate these significant interference problems.

Before partnering with Tarpon on the development of a new wireless facility in Hamden, Cellco did explore ways to modify the Hamden Cell Site and resolve these interreference problems. For example, in an effort to shrink the overall coverage footprint from Cellco's Hamden Cell Site, Cellco's radio frequency engineers examined the effects of reducing the Hamden Cell Site antenna height. Due to the overall height of West Rock Ridge, however, lowering the antennas did not eliminate the interference problem. (10/22/19 Tr., p. 18). Cellco also tried reducing the power output at the Hamden Cell Site. But again, due to the high ground elevation at West Rock Ridge, reducing the power output did not eliminate the interference problems Cellco is experiencing in southwest Hamden. (Tr. 2, pp. 36-37).

The only effective way to resolve the interference problems described above, is for Cellco to take its Hamden Cell Site (Beta sector antennas) off the air. Doing so, however, results in the significant loss of wireless service and the opening up of coverage gaps in large portions of southwest Hamden, including a portion of the Wilbur Cross Parkway (Route 15) immediately north of West Rock Ridge. (10/22/19 Tr., pp. 62-65). These gaps will, however, be sufficiently filled by coverage from the proposed Tarpon tower at the Property.[4] (Tarpon 1, p. 7, Exhibit F;

[4] The Tarpon tower would also fill an existing wireless service gap inside the West Rock Ridge Tunnel. (Cellco 2, Response 3; 10/22/19 Tr., pp. 21-23).

Tr. 2, pp. 62-65).

Conclusion

For the reasons set forth above, Cellco respectfully requests that the Council approve the Docket No. 486 Application.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

By _____

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CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of November, 2019, a copy of the foregoing was sent, via electronic mail, to:

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