

ORIGINAL

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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CONNECTICUT
SITING COUNCIL

IN RE:	:	
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APPLICATION OF MESSAGE CENTER	:	DOCKET NO. 320
MANAGEMENT FOR A CERTIFICATE OF	:	
ENVIRONMENTAL COMPATIBILITY AND	:	
PUBLIC NEED FOR THE CONSTRUCTION,	:	
MAINTENANCE AND OPERATION OF A	:	
TELECOMMUNICATIONS FACILITY AT	:	
GREENSWOOD ROAD EAST (ROUTE 44),	:	
NORFOLK, CONNECTICUT	:	SEPTEMBER 8, 2006

PETITION TO INTERVENE

Pursuant to Connecticut General Statutes (“C.G.S.”) Section 16-50n and Regulations of Connecticut State Agencies (“R.C.S.A.”) Section 16-50j-15a, Cellco Partnership d/b/a Verizon Wireless (“Cellco”) hereby requests permission of the Siting Council (“Council”) to participate, as an intervenor in the application and hearing process for Docket No. 320.

As the Council is aware, Cellco is a licensed provider of PCS service in Litchfield County, Connecticut. The tower proposed in Docket No. 320 fits neatly into Cellco’s network design for Litchfield County. Cellco may therefore be significantly affected by this proceeding.

In addition, Cellco has an interest in the hearing and in the pre-hearing process to aid the Council in evaluating the public interest and need considerations set forth in C.G.S. § 16-50g. Cellco’s expertise and experience in designing, constructing, operating and maintaining a wireless telecommunications system in the State of Connecticut in accordance with the rules and regulations of the Council, the Department of Public Utility Control and the Federal Communications Commission, may be of benefit to the Council in resolving issues presented in

Docket No. 320. Cellco has been admitted as an intervenor in prior Siting Council dockets.

Cellco proposes to participate in the hearing by cross-examining the Applicant's witnesses, offering oral and written testimony or evidence and filing pre-hearing interrogatories.

For the above-stated reasons, Cellco seeks permission to participate in this docket as an intervenor.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By 

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
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Its Attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of September 2006, a copy of the foregoing was sent,

postage prepaid, to:

Christopher B. Fisher. Esq.
Cuddy & Feder LLP
90 Maple Avenue
White Plains, NY 10601-5196


Kenneth C. Baldwin