

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF MCF  
COMMUNICATIONS bg, INC. AND  
OMNIPOINT COMMUNICATIONS, INC.  
FOR A CERTIFICATE OF ENVIRONMENTAL  
COMPATIBILITY AND PUBLIC NEED FOR  
THE CONSTRUCTION, MAINTENANCE AND  
OPERATION OF A TELECOMMUNICATIONS  
FACILITY AT 12 CARPENTER ROAD IN THE  
TOWN OF BOLTON, CONNECTICUT

DOCKET NO. \_\_\_\_\_

DATE: OCTOBER 4, 2006

APPLICATION FOR CERTIFICATE OF  
ENVIRONMENTAL COMPATIBILITY AND PUBLIC NEED

FILED BY:

MCF COMMUNICATIONS bg, INC.  
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and

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ROCKY HILL, CT 06067  
860-571-2021

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**I. Introduction**

**A. Purpose and Authority**

Pursuant to Chapter 277a, Sections 16-50g et seq. of the Connecticut General Statutes ("CGS"), as amended, and Sections 16-50j-1 et seq. of the Regulations of Connecticut State Agencies ("RCSA"), as amended, MCF Communications bg, Inc. ("MCF") and Omnipoint Communications, Inc., a subsidiary of T-Mobile USA, Inc. ("T-Mobile") (collectively the "Applicants") hereby submit an application and supporting documentation (collectively, the "Application") for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a wireless communications facility (the "Facility") in the Town of Bolton. The proposed Facility is a necessary component in the network plan of T-Mobile to provide personal wireless communications services in the State of Connecticut and Tolland County. The proposed Facility will provide service in the Towns of Bolton and Manchester, along Interstate I-384 as well as in adjacent areas.

## **B. Executive Summary**

The proposed Facility will consist of a 130 foot, self-supporting monopole, antennas, associated equipment and other site improvements integral to a wireless communications facility. MCF identified the property located at 12 Carpenter Road in Bolton (the "Property") for the construction and operation of its proposed Facility. The Property consists of 43 acres and is currently undeveloped and wooded. The Property is located in both the R-1 and R-2 Residential zone and abuts the Interstate 384, Exit 5 ramp.

The site is located in the northeastern portion of the Property (the "Site"). MCF proposes to install a monopole with appurtenances extending to approximately 130 feet in height and an equipment shelter at grade within a 70 foot by 70 foot fenced equipment compound ("Facility") The monopole and compound area will be designed to accommodate use by all of the wireless carriers active in Connecticut and the Bolton public safety communications, if requested. The compound will be enclosed by an 8-foot high chain-link fence.

Vehicular access to the Facility would extend from a proposed 460 foot gravel drive from Carpenter Road to the Site. Underground utility connections would extend from an existing utility pole on Carpenter Road to the Site.

T-Mobile has committed to locating on the Facility and will serve as the anchor tenant. T-Mobile's equipment also would be monitored 24 hours a day, 7 days a week from remote locations.

Included in this Application in Exhibit A is a report with a survey-based plans and other information detailing the Facility proposed at the Site and potential environmental

impacts associated therewith. MCF respectfully submits that the reports and other supporting documentation included in this Application contain relevant site specific information as required by statute and the regulations of the Connecticut Siting Council (the "Siting Council" or "Council"). A copy of the Council's Community Antenna Television and Telecommunication Facilities Application Guide with page references from this Application is also included in Exhibit B.

### **C. The Applicants**

MCF Communications is a stock corporation organized and existing under the laws of the Commonwealth of Massachusetts with its principal office located at 668 Main Street, Suite 114, Wilmington, MA 01887. MCF Communications, and its subsidiary, MCF Communications bg (the "Applicant") develop, own, manage and market communication sites in the New England states for wireless communication companies, which is its sole business in the state of Connecticut. Based on experience in the radio broadcast industry since the mid 1980's, MCF was established in 1998 to focus on the growing wireless communication industry. It has developed over 30 sites throughout the New England region, and worked with most of the mobile communication service providers, including co-applicant T-Mobile.

Omnipoint Communications Inc. is a subsidiary of T-Mobile USA, Inc. which is a federally licensed provider of wideband PCS services in the State of Connecticut and in other areas. It is a Delaware Corporation with a principal place of business at 12920 S.E. 38<sup>th</sup> Street, Bellevue, Washington 98006 and has offices in Connecticut at 20 Cold Spring Harbor, Rocky Hill, CT 06067.

Correspondence and/or communications regarding this Application shall be addressed to the attorneys for the applicants:

Cohen and Wolf, P.C.  
1115 Broad Street  
Bridgeport, CT 06604  
Attention: Julie Kohler, Esq.  
Carrie Larson, Esq.

**D. Application Fee**

Pursuant to RCSA Section 16-50v-1a(b), a check made payable to the Siting Council in the amount of \$1,000.00 accompanies this Application. The estimated total construction cost is approximately \$285,473. As such, the applicable application fee is \$1,000.00 in accordance with RCSA Section 16-50v-1a(b).

**E. Compliance with CGS Section 16-50/(c)**

Neither MCF nor T-Mobile is engaged in generating electric power in the State of Connecticut. As such, the proposed Facility is not subject to CGS Section 16-50r. The proposed Facility has not been identified in any annual forecast reports. As such, the proposed Facility is not subject to CGS Section 16-50/(c).

**II. Service and Notice Required by CGS Section 16-50/(b)**

Pursuant to CGS Section 16-50/(b), copies of this Application have been sent by certified mail, return receipt requested, to municipal, regional, State, and Federal officials. A certificate of service, along with a list of the parties served with a copy of the Application is included in Exhibit C. Pursuant to CGS 16-50/(b), notice of the Applicants' intent to submit this Application was published on two occasions in The Hartford Courant and The Journal Inquirer. Copies of the published legal notices are included in Exhibit D. The publishers' affidavits of service will be forwarded upon receipt. Further, in compliance with CGS 16-50/(b), notices were sent to each person appearing of record as owner of a property which abuts the Site. Certification of such notice, a sample notice

letter, and the list of property owners to whom the notice was mailed are included in Exhibit E.

### **III. Statements of Need and Benefits**

#### **A. Statement of Need**

As the Council is aware, the United States Congress, through adoption of the Telecommunications Act of 1996, recognized the important public need for high quality telecommunication services throughout the United States. The purpose of the Telecommunication Act's overhaul of the Communications Act of 1934 was to "provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans." H.R. Conf. Rep. No. 104-458, 206, 104<sup>th</sup> Cong., Sess. 1 (1996). With respect to wireless communications services, the Telecommunications Act of 1996 expressly preserved State and/or local land use authority over wireless facilities, placed several requirements and legal limitations on the exercise of such authority and preempted State or local regulatory oversight in the area of emissions as more fully set forth in 47 U.S.C. § 332(c)(7). In essence, Congress struck a balance between legitimate areas of State and/or local regulatory control over wireless infrastructure and the public's interest in its timely deployment to meet the public need for wireless services.

The Facility proposed in this Application is an integral component of T-Mobile's wireless network in this area of the State of Connecticut. Currently, a gap in coverage exists in T-Mobile's networks in the Bolton/Manchester area, specifically along Interstate I-384. The proposed Facility, in conjunction with other existing and future facilities in Bolton and surrounding towns, is needed by T-Mobile to provide its wireless services to people living in and traveling through this area of the State.

T-Mobile's specific need for the proposed Facility is detailed the propagation plots, attached hereto as Exhibit F, which identify T-Mobile's specific need for this Facility in the Bolton area. Based on the location of the proposed Facility and the lack of coverage in this area, MCF can not readily predict a point in time at which the Facility might reach maximum capacity.

**B. Statement of Benefits**

T-Mobile is a leading provider of advanced wireless voice and data services throughout the United States with over 20 million subscribers. T-Mobile and its corporate predecessors constructed one of the first wireless networks in Connecticut and is actively involved today in the deployment of next generation wireless services. Over the past two decades, T-Mobile has seen the public's demand for traditional cellular telephone services in a highly mobile environment migrate to a demand for anytime-anywhere wireless connectivity with the ability to send and receive voice, text, image and video. People today are using their wireless devices more and more as their primary form of communication for both personal and business needs. Modern devices allow for calls to be made, the internet to be reached and other services to be provided irrespective of whether a user is mobile or stationary and provided network service is available.

Wireless devices have become integral to the telecommunications needs of the public and their benefits can no longer be considered a luxury. Indeed, in an effort to ensure the benefits of wireless technologies to all Americans, Congress enacted the Wireless Communications and Public Safety Act of 1999 (the "911 Act"). The purpose of this legislation was to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. In enacting the 911 Act, Congress found that networks that

would provide for the rapid, efficient deployment of emergency services would enable faster delivery of emergency care with reduced fatalities and severity of injuries. With each year since passage of the 911 Act, additional anecdotal evidence supports the public safety value of improved wireless communications in aiding lost, ill or injured individuals such as motorists, hikers and boaters.

As an outgrowth of the 911 Act, the FCC mandated wireless carriers, such as T-Mobile, to provide enhanced 911 services ("E911") as part of their communications networks. These services ultimately allow 911 public safety dispatchers to identify a wireless caller's geographical location within several hundred feet. T-Mobile has deployed and continues to deploy network technologies to implement the FCC's E911 mandates. The proposed Facility in Bolton will become an integral component of T-Mobile's E911 network in this area of the state. These factors will apply equally to other wireless carriers as they expand their service in the Bolton area through the proposed Facility.

### **C. Technological Alternatives**

The FCC licenses granted to T-Mobile and other wireless carriers authorize them to provide cellular and PCS services in this area of the State through deployment of a network of wireless transmitting sites. The proposed Facility is a necessary component of T-Mobile's wireless network. The proposed Facility will also allow other wireless carriers to provide services in this area.

Repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies are not a practicable or feasible means to providing service within the sizeable coverage gap in this area. Significant terrain variations and tree cover in Bolton and the surrounding area, as well as other practical considerations limit the use

of such technologies. As such, they are not an alternative to the proposed Facility. The Applicants submit that there are no equally effective technological alternatives to construction of a new tower Facility for providing reliable personal wireless services in this area of Connecticut.

#### **IV. Site Selection and Tower Sharing**

##### **A. Site Selection**

A search area is an area where a coverage and/or capacity problem exists within a carrier's network and where a new wireless facility is needed to provide service to the public. In general, wireless carriers and developers attempt to identify any existing towers or other structures of adequate height in a site search area and the surrounding environs which might accommodate the height and structural requirements for a wireless facility. There are no existing towers or other tall structures within approximately two miles of the proposed sites and no wireless facilities exist in this area of Bolton.<sup>1</sup>

Initially, both individual carriers and MCF seek to identify any existing towers or other structures of adequate height in a site search area and the surrounding environs that may accommodate a wireless facility. MCF identified eight (8) towers within approximately four (4) miles of the site search area. All are located outside of T-Mobile's search ring and therefore would not provide adequate coverage. In addition, all are noted in the table of "Surrounding Site Information" included in Exhibit G.

Once it was determined that a new tower facility was required, MCF's goal was to find properties upon which a facility could be constructed and provide service to the

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<sup>1</sup> The Council's Application Guide (N) requests a list of towers within four miles of the site search area "or within any other area from which use of the proposed prime or alternative tower might be feasible." Given T-Mobile's system and use of towers when feasible that are often within two miles of a proposed facility, existing towers over two miles from a site search area are not technically feasible. Despite that, MCF has included information on all known towers within a four (4) mile radius of the site.

public while at the same time minimizing any potential environmental impact to the extent practicable and feasible. The Site Search Narrative and Map in Exhibit H detail and depict the locations reviewed during MCF's search and the narrative details the reasons for elimination from consideration of all but the proposed Site.

### **B. Tower Sharing**

To promote the sharing of wireless facilities in the Bolton area, MCF has proposed a Facility that can accommodate up to four antenna platforms and equipment for the wireless carriers in the Connecticut marketplace and the Bolton public safety functions. T-Mobile has committed to use the Facility, if approved. In addition, Nextel has an expressed an interest in co-locating at the Facility, if approved. Details of the design are included in Exhibit A. MCF has committed to provide, free of charge, space on the proposed monopole for the Bolton public safety communications antennas.

### **V. Facility Design**

MCF has leased a 4,900 square foot parcel within the approximately 43 acre Property. A copy of the recorded Notice of Lease is attached hereto as Exhibit I. The proposed Facility would be constructed as a 130 foot high self-supporting monopole. T-Mobile would install up to twelve panel antennas on a platform at 127 feet AGL and occupy an equipment shelter, approximately 12 feet by 20 feet in size, within a 70 foot by 70 foot equipment compound. The compound would be enclosed by a security, chain-link fence, 8 feet in height. The monopole and equipment compound are designed to accommodate the facilities of all wireless carriers active in the Connecticut marketplace and Bolton emergency services, if requested.

Vehicular access to the Facility would extend from Carpenter Road via a 460 foot gravel access driveway to the equipment compound. Utility connections would extend

underground from existing utility pole on Carpenter Road to the compound. Exhibit A contains the specifications for the proposed Facility at the Site including a site plan, a compound plan, tower elevation, access map and other relevant information contained in a Site Evaluation Report and Facilities and Equipment Specifications. Exhibit J includes a copy of the Phase I environmental assessment that was conducted and Exhibit K includes a computer-based, predictive viewshed map, photosimulations, sightline graphs and visibility analysis taken after a balloon float at the Site. Some of the relevant information included in these exhibits for the Site reveals that:

- The property is classified in the R-1 and R-2 Residential zoning district and the Site is located in the R-2 Residential zoning district;
- No wetlands are found within 280 feet of the proposed site or new access drive;
- The Property is and will continue to be used undeveloped, wooded land;
- Moderate clearing would be required for development of the proposed access drive and compound area;
- The proposed Facility will have no effect on historic or architectural resources according to the State Historic Preservation Officer; and
- The proposed Facility will have no impact on water flow, water quality, or air quality and will not emit any noise.

#### **VI. Environmental Compatibility**

Pursuant to CGS Section 16-50p, the Council is required to find and to determine as part of the Application process any probable environmental impact of the facility on the natural environment, ecological balance, public health and safety, scenic, historic and recreational values, forest and parks, air and water purity and fish and wildlife. As

demonstrated in this Application and the accompanying Attachments and documentation, the proposed Facility will have no significant adverse environmental impacts.

#### **A. Visual Assessment**

The visual impact of the proposed Facility would vary from different locations around the towers depending upon factors such as vegetation, topography, distance from the towers, and the location of structures around the towers. The Applicants retained Clough Harbour & Associates LLP ("CHA") to prepare the visual resources evaluation.

Exhibit K contains a computer-based, predictive viewshed model which depicts the potential impact of the proposed Facility from surrounding views for the Site, a visual methodology report, site line graphs and photosimulations. Originally, in the technical report, a copy of which is being bulk-filed, the Applicants proposed a 150 foot tower. However, after careful analysis and in an effort to ensure that the proposed Facility not only provides adequate coverage for T-Mobile's gap in coverage but also has a de minimus impact on the surrounding areas, the Applicants have reduced the proposal to 130 feet, further reducing any potential visual impact of the Facility. CHA's visibility analysis was revised accordingly.

In general, the visibility of the proposed tower at the Site is insignificant. In general, the visibility report demonstrates that the Facility would be visible year-round from only 37 acres, which is approximately .5% of the entire study area. In addition, the Facility will be visible seasonally from an additional 88 acres, which is approximately 1% of the entire study area. Overall, three residences would have year-round visibility and an additional twenty residences will have seasonal visibility of some portion of the Facility. The visibility of the tower at the proposed Site will be minimized due largely to the topography and extent of tree cover found within the Study Area.

The compound area will have a de minimis visual impact as it will be screened by the proposed fencing and the existing mature vegetation at the Site. As can be seen from the comprehensive site plan at Exhibit A, the Site is located deep within the Property, which consists of mature, wooded vegetation, which will eliminate virtually any potential visual impact of the compound area.

Weather permitting, MCF will raise a balloon with a diameter of at least three (3) feet at the proposed Site on the day of the Council's first hearing session from 3 p.m until 5 p.m. (or a time otherwise determined by the Council) on this Application, or at a time otherwise specified by the Council.

#### **B. Solicitation of State Agency Comments**

MCF submitted requests for review and comment for each site to the Connecticut State Historic Preservation Officer ("SHPO") and Department of Environmental Protection ("DEP") representatives responsible for the Natural Diversity Data Base and endangered species review. Copies of the SHPO response letter and DEP response letter are attached hereto as Exhibit L. Those response letters demonstrate that the proposed Facility will have no impact on designated wilderness areas, wildlife preserves, endangered and threatened species, historic districts or sites, Indian religious sites or flood plains.

#### **C. Power Density Analysis**

In August 1996, the FCC adopted a standard for exposure to Radio Frequency ("RF") emissions from telecommunications facilities like those proposed in this Application. To ensure compliance with applicable standards, T-Mobile has performed maximum power density calculations for the proposed Facility assuming that the antennas were pointed at the base of the tower and all channels were operating

simultaneously. The resulting power density for T-Mobile's operations at the proposed Site would be approximately 4.7728% of the applicable MPE standards. A copy of the power density calculation is attached as Exhibit M.

#### **D. Other Environmental Factors**

The proposed Facility would be unmanned, requiring monthly maintenance visits by each carrier that will last approximately one hour. T-Mobile's equipment at the Facility would be monitored 24 hours a day, 7 days a week from a remote location. The proposed Facility at the Site would not require a water supply or wastewater utilities. No outdoor storage or solid waste receptacles will be needed. Further, the proposed Facility will not create or emit any smoke, gas, dust or other air contaminants, noise, odors or vibrations. The construction and operation of the proposed Facility will have no significant impact on the air, water, or noise quality at the Site.

MCF has evaluated the Site in accordance with the FCC's regulations implementing the National Environmental Policy Act of 1969 ("NEPA"). The NEPA report is attached hereto as Exhibit N. The Site was not identified as a wilderness area. No National Parks, National Forests, National Parkways or Scenic Rivers, State Forest, State Designated Scenic Rivers or State Gamelands are located in the vicinity of the Site. Several State and local parks exist within the surrounding area of the proposed Facility but, as demonstrated in the visibility evaluation at Exhibit K, none of those resources will be affected by the proposed Facility. The Site is not located in or adjacent to any areas identified as a federal wildlife preserve. Further, according to the site survey and field investigation and environmental report attached as Exhibit J, no federally regulated wetlands or watercourses will be impacted by the proposed Facility. Federal Emergency Management Agency ("FEMA") Flood Insurance Rate Maps of the proposed Site

indicated that the Site is not located in the 100 year floodplain . As such, and based on the information contained in other reports included in this Application, the Site is categorically excluded from any requirement for further environmental review by the FCC in accordance with NEPA and no permit is required by that agency prior to construction of the proposed Facility. See 47 C.F.R. §§ 1.1306(b) and 1.1307(a).

**VII. Consistency with the Bolton Land Use Regulations**

Pursuant to the Council's Application Guide, included in this section is a narrative summary of the consistency of the project with the local municipality's zoning and wetland regulations and plan of conservation and development. A description of the zoning classification of the Site and the planned and existing uses of the proposed site locations are also detailed in this section.

**A. Bolton Plan of Conservation and Development**

The Bolton Plan of Conservation and Development (the "Plan"), a copy of which is included in the bulk filing, was adopted on December 1, 2005. While wireless communications and telecommunications facilities are not specifically addressed, one of the main goals delineated in the Plan is to "[m]aintain adequate levels of municipal services. See Bulk Filing, Plan at 9. Accordingly, MCF respectfully submits that the proposed Facility, which will provide needed wireless communications service within the Town and a means for upgrading the Town's emergency communications, is consistent with the Town's plan for wireless communications.

**B. Bolton Zoning Regulations and Zoning Classification**

According to the Town's zoning map and municipal tax records, the Site is classified in the R-1 and R-2 Residential zoning districts.

Section 17 of the Town's Zoning Regulations sets forth the Town's Wireless Telecommunications regulations. Section 17a states that the purpose(s) of the wireless regulations is, *inter alia*, "to encourage providers to co-locate their facilities on a single tower," to "site facilities below visually prominent ridge lines," and "avoid potential damage to adjacent properties from tower failure through engineering and careful siting of tower structures." See Bulk Filing, Zoning Regulations, § 17.

Section 17F of the Zoning Regulations sets forth the standards and dimensional requirements for proposed wireless telecommunications towers. Consistency of the proposed Facility with these standards and dimensional requirements are illustrated in the table below.

**Standards and Dimensional Requirements**

<b>Regulation Section</b>	<b>Requirement of Regulation</b>	<b>Proposal</b>
<b>Section 17F (1) (b)</b>	<b>Minimum Lot Area</b>	<b>Site</b>
	Min. Lot Area is 40,000 square feet	Lot size is 43 acres
<b>Section 17F (2)</b>	<b>Maximum Height</b>	<b>Site</b>
	150 feet	Proposed Height is 130 feet
<b>Section 17F (3) (a)</b>	<b>Setback</b>	<b>Site</b>
	Minimum Setback is 125% of the proposed tower height, or 162.5 feet	Setback to closest property line from tower is 165 feet
<b>Section 17F (3) (b)</b>	<b>Equipment Shelter Setback</b>	<b>Site</b>
	Must comply with setback in underlying zone: R1 –40 feet R2 – 40 feet	Setback to nearest property line is 165 feet
<b>Section 17F (4)</b>	<b>Building Size</b>	<b>Site</b>
	Lot coverage area of all buildings shall not exceed 500 square feet per tower	Proposed equipment shelter coverage is 265 square feet
<b>Section 17G (1)</b>	<b>Distance to Residence</b>	<b>Site</b>
	Minimum Distance to closest residence is 200 feet	Setback to closest residence is 300 feet

**C. Planned and Existing Land Uses**

The proposed Site will be located in the northeastern portion of an approximately 43 acre Property. The Property contains minimal development and no development other development other than the proposed Facility is planned. Residential development

surrounds the Property. Consultation with municipal officials and observations did not indicate any known or planned changes in surrounding land uses.

**D. Bolton Inland Wetlands and Watercourses Regulations**

The Bolton Inland Wetlands and Watercourses Regulations (“Local Wetlands Regulations”) regulate certain activities conducted in or adjacent to “wetlands” as defined therein. One such regulated activity is “any removal or deposition of material or any obstruction, construction, alteration or pollution” of such wetland and in areas adjacent to a wetland or watercourse. Wetlands buffers are defined as 100 feet measured horizontally from the wetland or watercourses. See Bulk Filing, Inland Wetlands Regulations at 3.4.

According to the site survey and field investigations conducted at the Site location, no watercourses or wetlands are located on or near the proposed Site. See Exhibit A. In accordance with the Connecticut Soil Erosion Control Guidelines, as established by the Council of Soil and Water Conservation, soil erosion control measures and other best management practices will be established and maintained throughout the construction of the proposed Facility.

**VIII. Consultations with Local, State and Federal Officials**

**A. Local Consultations**

CGS Section 16-50/(e) requires an applicant to consult with the local municipality in which a proposed facility may be located and with any adjoining municipality having a boundary of 2,500 feet from the proposed facility concerning the proposed and alternate sites of the facility.

On June 8, 2006, MCF hand-delivered a copy of a technical report to the Town of Bolton with respect to the proposed Facility at the Site. The meeting on June 8, 2006

formally introduced the proposed Facility to Town officials and invited the Town to discuss any comments or questions about the Facility with MCF. The technical report, a copy of which is being bulk filed, included specifics about the proposed Site and addressed the public need for the Facility, the site selection process and the environmental effects of the proposed Facility. In addition, because the Property is within 2,500 feet of the Manchester/Bolton town line, MCF also hand-delivered a copy of the technical report to the Town of Manchester on June 8, 2006.

The Town of Manchester indicated that it did not have any concerns with the proposed Facility. The Town of Bolton held several information meetings through its planning and zoning commission. The majority of the Town's concerns are addressed at the site selection process and those concerns are addressed in the site selection narrative attached hereto as Exhibit H. The site selection narrative indicates that MCF completed an exhaustive site selection process. In particular, MCF did speak with the Town of Manchester concerning property owned by the Town of Manchester near the Property. The Town of Manchester has indicated that it is not willing to lease that property for the purpose of constructing the proposed Facility. In addition, the materials submitted in this report, including the power density calculations, address all of the concerns raised by the Town during its informational meeting. Finally, one concern of the Town concerned the color, design and height of the tower. As discussed, the technical report proposed a 150 foot tower, color to be determined. After close examination, the Applicants have voluntarily dropped the height to 130 feet. In addition, the Applicants have left the color choice of the tower to the discretion of the Council. Therefore, the Applicants represent that they have addressed the concerns and comments of the Town of Bolton.

A copy of the correspondence with both Bolton and Manchester, including the comments from the Town of Bolton's informational meeting, attached hereto as Exhibit O.

**B. Consultations with State Officials**

As noted in Section VI.B of this Application, MCF consulted with and requested review of the proposed Facility from DEP and SHPO. Exhibit L contains DEP and SHPO's correspondence for the proposed Site. Both DEP and SHPO stated that the proposed Facility will have no effect on environmental or historic resources.

**C. Consultation with Federal Agencies**

MCF has received determinations from the Federal Aviation Administration ("FAA") for the Site, which are included in Exhibit P. The results indicate the proposed Facility would not even require FAA registration, let alone FAA review as a potential air navigation obstruction or hazard. As such, no FAA lighting or marking would be required for the towers proposed in this Application.

T-Mobile's FCC license permits it to modify its network by building wireless facilities within its licensed area without prior approval from the FCC provided that a proposed facility does not fall within one of the "listed" categories requiring review under NEPA. The "listed" categories, included in 47 CFR §1.1307, are activities that may affect wilderness areas, wilderness preserves, endangered or threatened species, critical habitats, National Register historic districts, sites, buildings, structures or objects, Indian religious sites, flood plains and federal wetlands. As noted in Section VI.D of this Application, MCF conducted a review for the Site and determined that the Site does not fall under any of the NEPA "listed" categories of 47 CFR §1.1307. Therefore, the proposed Facility does not require review by the FCC pursuant to NEPA.

**IX. Estimated Cost and Schedule**

**A. Overall Estimated Cost**

The total estimated cost of construction for the proposed Facility is \$285,473. This estimate includes:

- (1) Tower and foundation costs (including installation) of approximately \$67,895;
- (2) Site development costs of approximately \$124,950; and
- (3) Utility installation costs of approximately \$53,252.

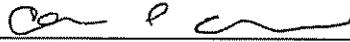
**B. Overall Scheduling**

Site preparation and engineering would commence immediately following Council approval of MCF's Development and Management ("D&M") Plan and is expected to be completed within three (3) to four (4) weeks. Installation of the monopole, antennas and associated equipment is expected to take an additional two (2) weeks. The duration of the total construction schedule is approximately six (6) weeks. Facility integration and system testing is expected to require an additional two (2) weeks after the construction is completed.

**X. Conclusion**

This Application and the accompanying materials and documentation clearly demonstrate that a public need exists in the Bolton area for improved wireless services. The foregoing information and attachments also demonstrate that the proposed Facility will not have any substantial adverse environmental effects. The Applicants respectfully submit that the public need for the proposed Facility outweighs any potential environmental effects resulting from the construction of the proposed Facility at the Site. As such, the Applicants respectfully request that the Council grant a Certificate of Environmental Compatibility and Public Need to MCF for a proposed wireless telecommunication facility at 12 Carpenter Road, Bolton, Connecticut.

Respectfully Submitted,

By:   
\_\_\_\_\_  
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