

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 325
D/B/A VERIZON WIRELESS FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE :
AND OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY AT 111 :
UPPER FISH ROCK ROAD, SOUTHURY, : JANUARY 29, 2007
CONNECTICUT :

PRE-HEARING SUBMISSION OF
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

Cellco Partnership d/b/a Verizon Wireless ("Cellco") hereby provides the Connecticut Siting Council ("Council") with the following pre-hearing information available at this time regarding the above-referenced Application.

A. List of Witnesses

Sandy M. Carter, Regulatory Manager, Cellco Partnership

David Crotty, Senior Radio Frequency Engineer, Cellco Partnership

Michael Libertine, LEP, Director Environmental Services, Vanasse Hangen Brustlin, Inc.

Douglas J. Roberts, AIA, URS Corporation

These witnesses will testify as to all matters covered in Cellco's Petition to Intervene and exhibits.

B. Exhibits to be offered

Cellco intends, at this time, to offer the following Exhibits:

1. Application for a Certificate of Environmental Compatibility and Public Need filed by Cellco Partnership d/b/a Verizon Wireless dated November 2, 2006, including attachments and the following bulk file exhibits:
 - a. Southbury Zoning Regulations and map;
 - b. Southbury Plan of Conservation and Development;
 - c. Southbury Inland Wetlands and Watercourses Regulations; and
 - d. Cellco's "Technical Report" dated August 22, 2006, filed with the Towns of Southbury and Newtown.
2. Affidavit of Publication submitted to the Council on November 16, 2006, from the *Waterbury Republican-American*.
3. Notification Pursuant to C.G.S. § 16-50(e) dated November 16, 2006; and
4. Cellco's Responses to Pre-Hearing Interrogatories from the Council dated January 9, 2007.

Cellco reserves the right to offer additional exhibits, testimony, witnesses and administratively noticed materials as new and pertinent information and materials come to its attention and in rebuttal to positions taken by the Council, parties or intervenors.

Respectfully submitted,

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS

By: 

Kenneth C. Baldwin
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Its Attorneys