

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 332
D/B/A VERIZON WIRELESS FOR A :
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE AND :
OPERATION OF A TELECOMMUNICATIONS :
FACILITY IN WASHINGTON, CONNECTICUT : JULY 5, 2007

RESPONSES OF CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS
TO CONNECTICUT SITING COUNCIL PRE-HEARING INTERROGATORIES – SET 2

On June 22, 2007, the Connecticut Siting Council (“Council”) issued Pre-Hearing Interrogatories Set 2 to the applicant, Cellco Partnership d/b/a Verizon Wireless (“Cellco”), relating to the above-captioned docket. Below are Cellco’s responses.

Question No. 9

The response to Interrogatory 5 states a residence owned by the lessor is within 1,000 feet of the proposed Site 1 tower. Are there any other residences within 1,000 feet of the Site 1 tower? What is the distance from the tower site to the residence at 17 Pleasant Drive?

Response

No. The residence located approximately 840 feet to the south is the only residence within 1,000 feet of the Site 1 tower location. The property on which this residence is located is owned by the Site 1 landlord, H. Ray and Carol A. Underwood. The residence at 17 Pleasant Drive is located approximately 1,265 feet from the Site 1 tower.

Question No. 10

The response to Interrogatory 2 states both property owners would prefer a “monopine”.
Would both landowners accept a traditional monopole with an unpainted or painted finish?

Response

Cellco has explained to both of its landlords that the ultimate decision regarding the type of tower approved at either location rests with the Council, and that their individual preference was only one factor in the ultimate approval process. This was explained to each of Cellco’s landlords again following the First Selectman’s comments at the June 21, 2007 hearing regarding the Town’s preference for a traditional monopole design rather than a tree tower.

Question No. 11

Could Cellco relocate Site 1 at a higher elevation on the Underwood parcel? Preferably, the new location would have a lower tower height to blend in more naturally with existing vegetation.

Response

No. The higher ground elevation on the Underwood property is simply not accessible due to the severe topography (1 to 1 slopes and vertical rock outcroppings) to the north and west of the Site 1 location. Extraordinary efforts would have to be undertaken to construct a site compound and access road on these steep slopes. The resulting environmental impacts of these efforts would be significant, to say the least. Attached behind Tab 1 is a portion of the New Preston CT, U.S.G.S. Topographic Quadrangle Map showing the severe topography within the limits of the Underwood property. The Site 1 compound as proposed in the Application is located on a small plateau and would utilize the existing access road from Mountain Road to within 100 feet of the site compound.

Question No. 12

What is the extent and quality of existing coverage on Route 202 in the vicinity of the sites? Is there uninterrupted in-vehicle coverage from the New Milford/Washington town line to Marbledale?

Response

As illustrated on the existing RF coverage plot behind Tab 7 of the Application, Cellco currently provides no wireless service at all along Route 202 in the Town of Washington from its existing New Milford East and Litchfield SW cell sites. What little “spill over” coverage Cellco has in the vicinity of the proposed Washington North cell sites, results from an occurrence known as “hill-topping”. As indicated on the existing coverage plot behind Tab 7 of the Application, coverage from Cellco’s New Milford East cell site reaches some of the higher ground elevations (the hill-tops) north of Route 202 in the Marbledale area. In fact, the existing coverage map shows very clearly that the hill top where the Site 1 facility is located has coverage from the New Milford East cell site. This certainly explains why residents and Council members were able to make and receive phone calls at Site 1 during the June 21, 2007 site visit.

Perhaps another explanation as to why some Washington residents claim to have coverage along Route 202 in the Marbledale area is due to Cellco’s current roaming arrangements with Alltel Communications (“Alltel”), a provider of 800 MHz cellular service in Litchfield County. Alltel currently maintains antennas on the existing New Milford East tower at 399 Chestnut Land Road in New Milford. Before Cellco was able to provide wireless (PCS) service in Litchfield County, it had entered into a roaming agreement with Alltel. This agreement allows Cellco customers to use Alltel’s network where they currently provide service in Litchfield County. The extent of Alltel’s 800 MHz cellular coverage from the New Milford

East cell site is similar to the coverage that AT&T (formerly New Cingular) provides at 850 MHz. That coverage is illustrated on the existing coverage map behind Tab 1 of AT&T's Interrogatory Responses to the Council dated June 8, 2007 and further supported by AT&T's recently filed base line drive data.

Based on the AT&T plot and drive data, we can safely assume that like AT&T, Alltel probably offers some limited coverage along portions of Route 202 between the New Milford town line and the Marbledale area. That coverage is, at best, spotty and unreliable, and does not extend to the east of Marbledale along Route 202. Cellco, therefore, does not currently provide its customers with reliable wireless service along Route 202 between the New Milford town line and Marbledale, on either its existing PCS network or while roaming on Alltel's cellular network.

Question No. 13

Is Cellco aware of the Optasite Inc. filing with the Council (Docket 342) for the construction of a 140-foot monopole at 425 Litchfield Road in New Milford? Has Cellco examined potential coverage from this location?

If so, provide propagation plots of the heights examined.

If not, provide the following propagation plots at a scale of 1:40,000 using multiple signal levels (in-building, in-vehicle, on-street) from the Optasite location:

- a) at an antenna height of 127 feet
- b) at an antenna height of 117 feet.

Please provide the following information used to generate the plots: number of channels, effective radiated power for each channel, and frequency.

Response

Yes, Cellco is aware of the Optasite Inc. (“Optasite”) application which was filed with the Council on June 22, 2007. This proposed tower location was evaluated and it was determined that antennas at a height of 117 feet AGL would satisfy Cellco’s objectives for its New Milford NE search area. The plots requested are included behind Tab 2.

Coverage map parameters:

Number of Channels:	Pilot Power only
EIRP Per Channel:	228 Watts
Frequency:	1900 MHz

Question No. 14

Provide propagation plots showing coverage at a scale of 1:40,000 using multiple signal levels (in- building, in-vehicle, on-street) depicting coverage from the following:

- a) Site 1 at 150 feet and the Optasite location at 127 feet;
- b) Site 1 at 130 feet and the Optasite location at 127 feet;
- c) Site 2 at 150 feet and the Optasite location at 127 feet;
- d) Site 2 at 130 feet and the Optasite location at 127 feet.

Response

The plots requested are included behind Tab 3.

Question No. 15

Estimate the number of residences within a quarter-mile of each site that would have year-round views of either tower.

Response

Site 1 – Approximately 1 residence.

Site 2 – Approximately 3 residences, including the residence on the site.

Question No. 16

According to the viewshed maps, both towers would be visible from a continuous half-mile section of Route 202 north of Marbledale. Please characterize land use in this area.

Response

The existing land use along Route 202 in Marbledale is predominately commercial in nature, including two gas stations, restaurants, a nursery and small office uses.

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of July, 2007, a copy of the foregoing was mailed,
postage prepaid, to:

Town of Washington

Steven R. Smart, Esq.
Riefberg, Smart, Donohue & NeJame, P.C.
9 Old Sugar Hollow Road
Danbury, CT 06810

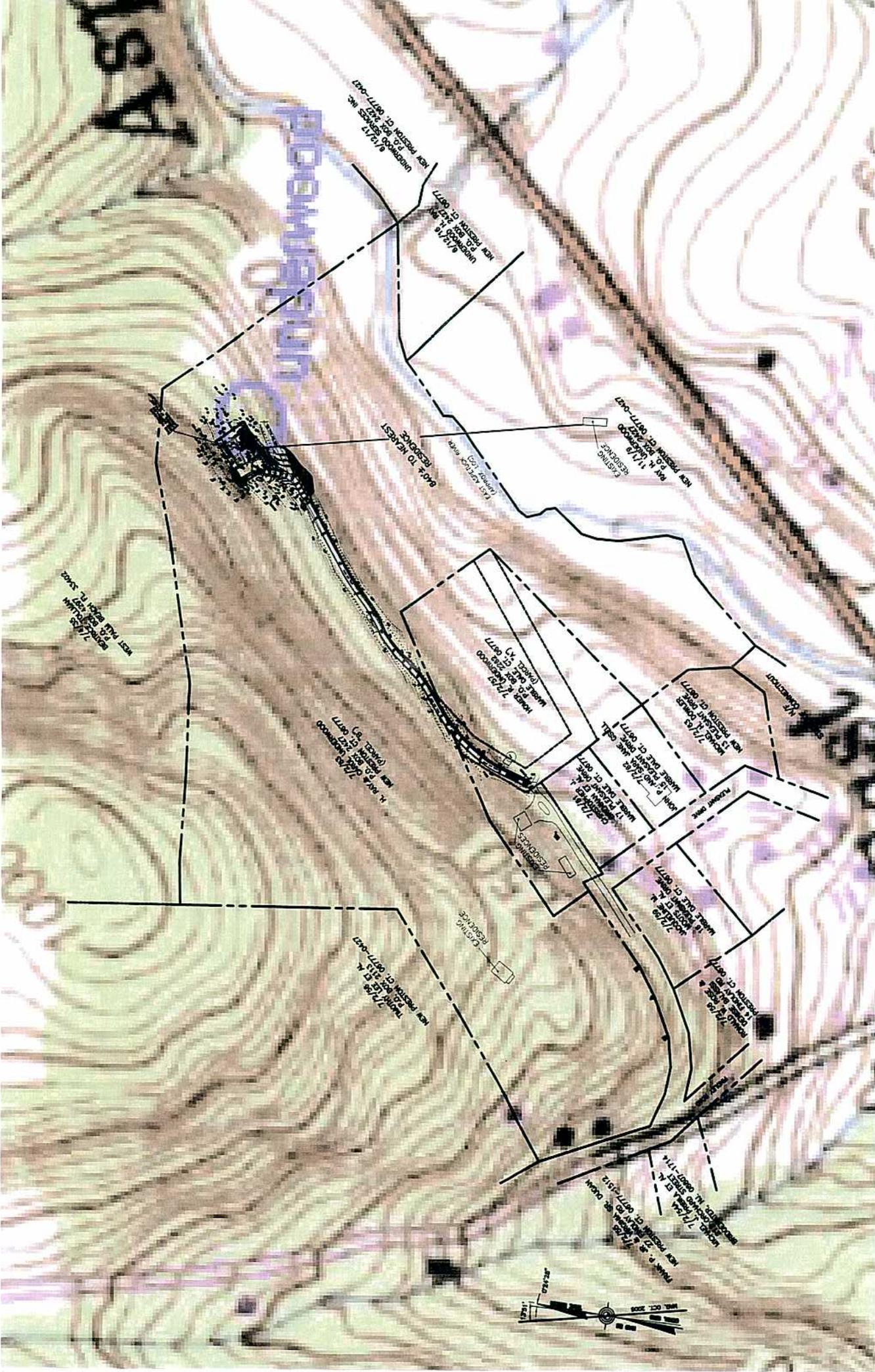
and

Richard C. Sears
First Selectman
Washington Town Hall
P.O. Box 383
2 Bryan Plaza
Washington Depot, CT 06794

AT&T Wireless PCS, LLC

Christopher B. Fisher, Esq.
Cuddy & Feder LLP
445 Hamilton Avenue, 14th Floor
White Plains, NY 10601


Kenneth C. Baldwin



ASTA

RECOMMENDED

ST. BARNABAS

ST. BARNABAS

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

ROAD TO FOREST

EXISTING RESIDENCE 1118 NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

NEW RESIDENTIAL 215 E. K. NEW RESIDENTIAL OF 0877-0427

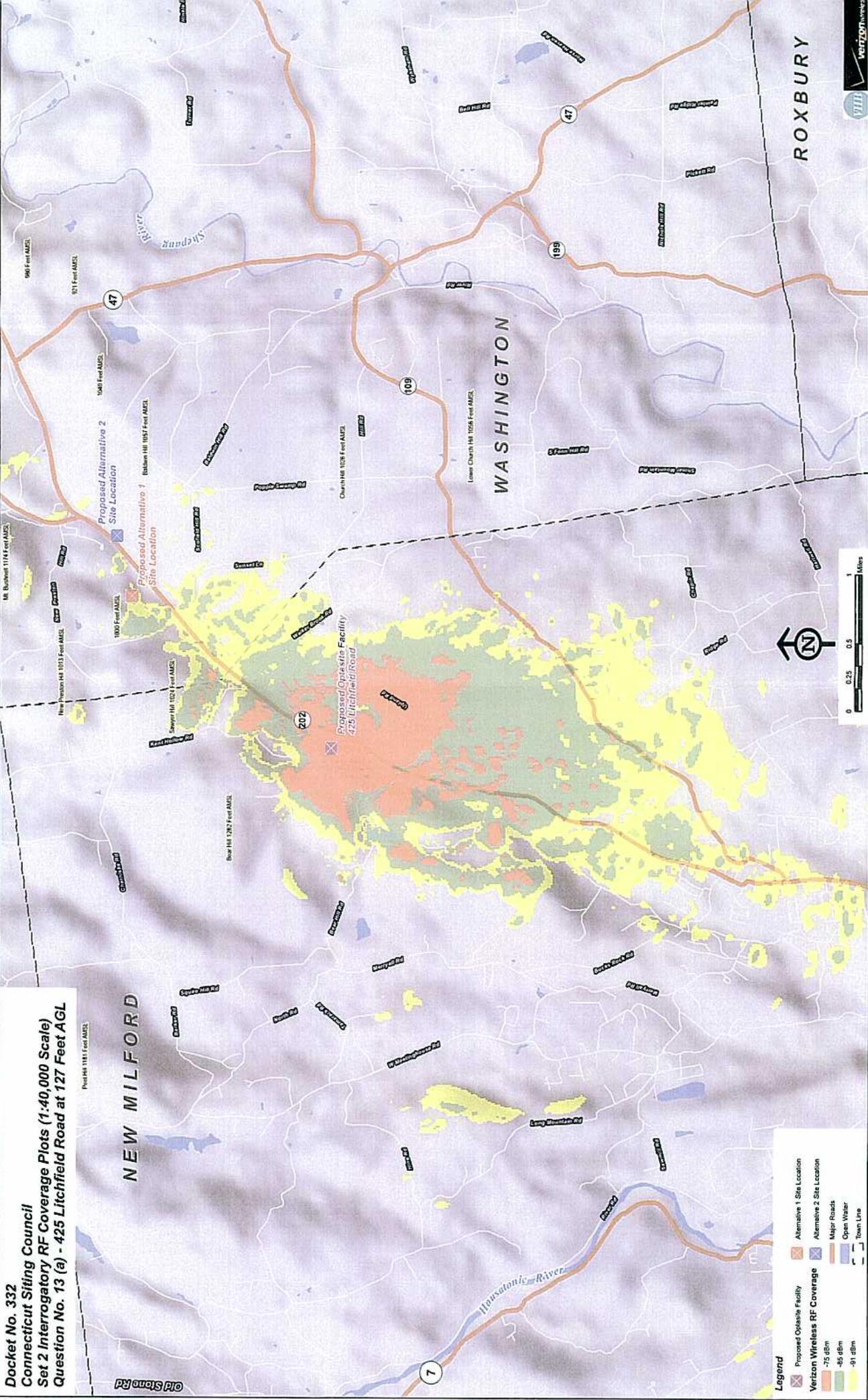


Docket No. 332

Connecticut Siting Council
Set 2 Interrogatory RF Coverage Plots (1:40,000 Scale)
Question No. 13 (a) - 425 Litchfield Road at 127 Feet AGL

Peak HA 1181 Feet AMSL

NEW MILFORD



Legend

- Proposed Facility
- Proposed Facility
- Alternative 1 Site Location
- Alternative 2 Site Location
- Verizon Wireless RF Coverage
- 75 dBm
- 85 dBm
- 91 dBm
- Major Roads
- Open Water
- Iron Line



Verizon
VIII

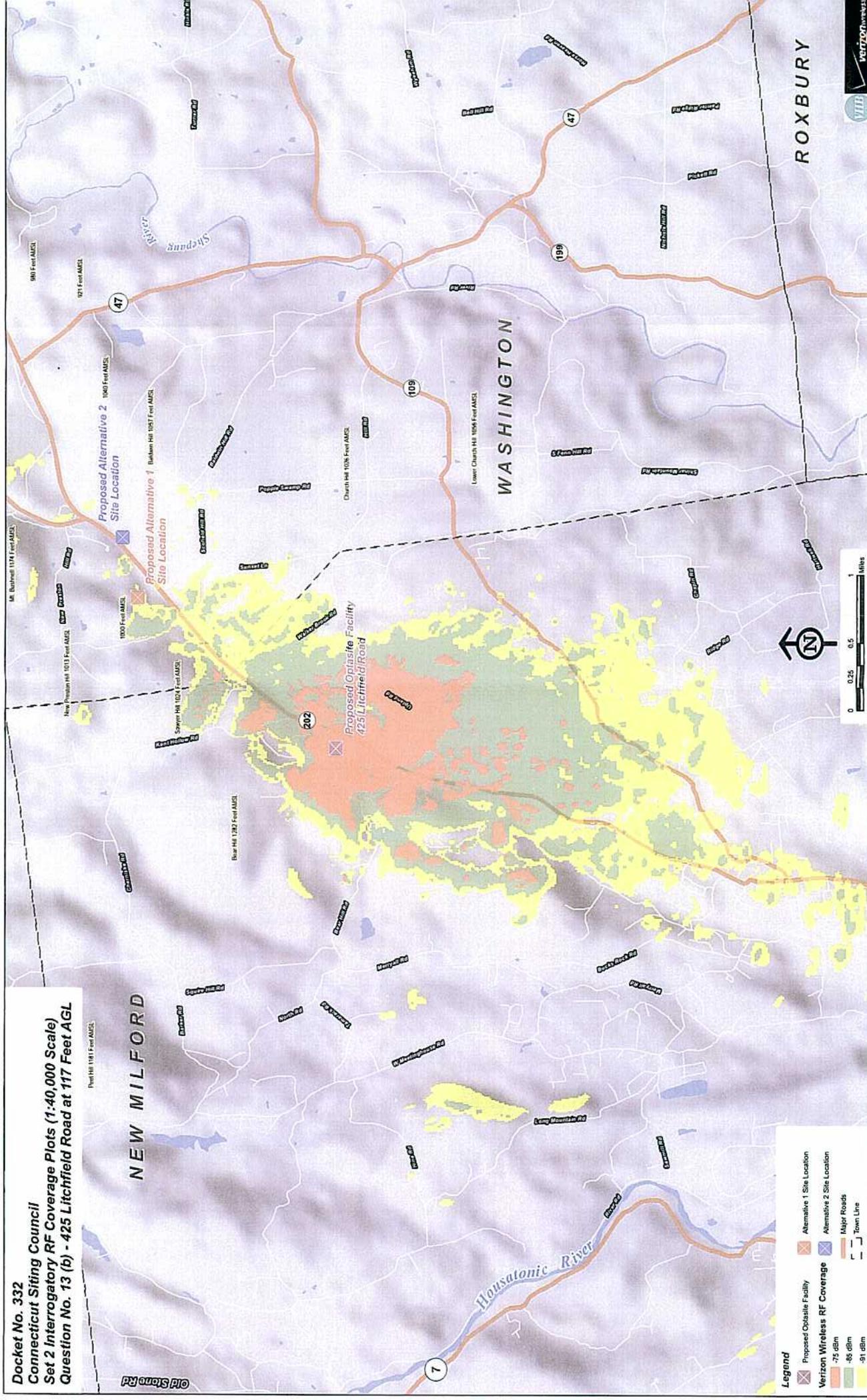
Docket No. 332
Connecticut Siting Council
Set 2 Interrogatory RF Coverage Plots (1:40,000 Scale)
Question No. 13 (b) - 425 Litchfield Road at 117 Feet AGL

Proposed Opasite Facility
 425 Litchfield Road

NEW MILFORD

WASHINGTON

ROXBURY

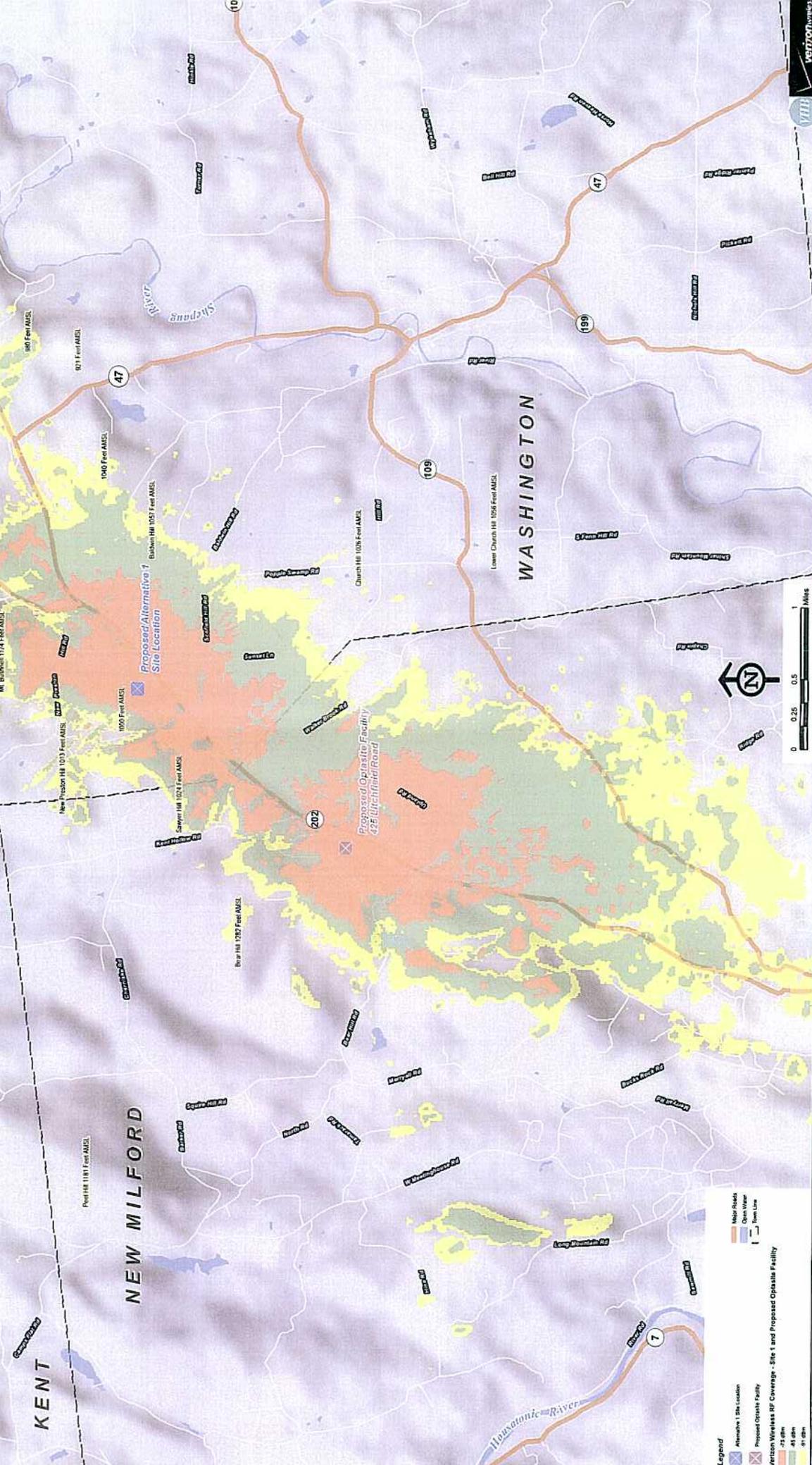


Legend

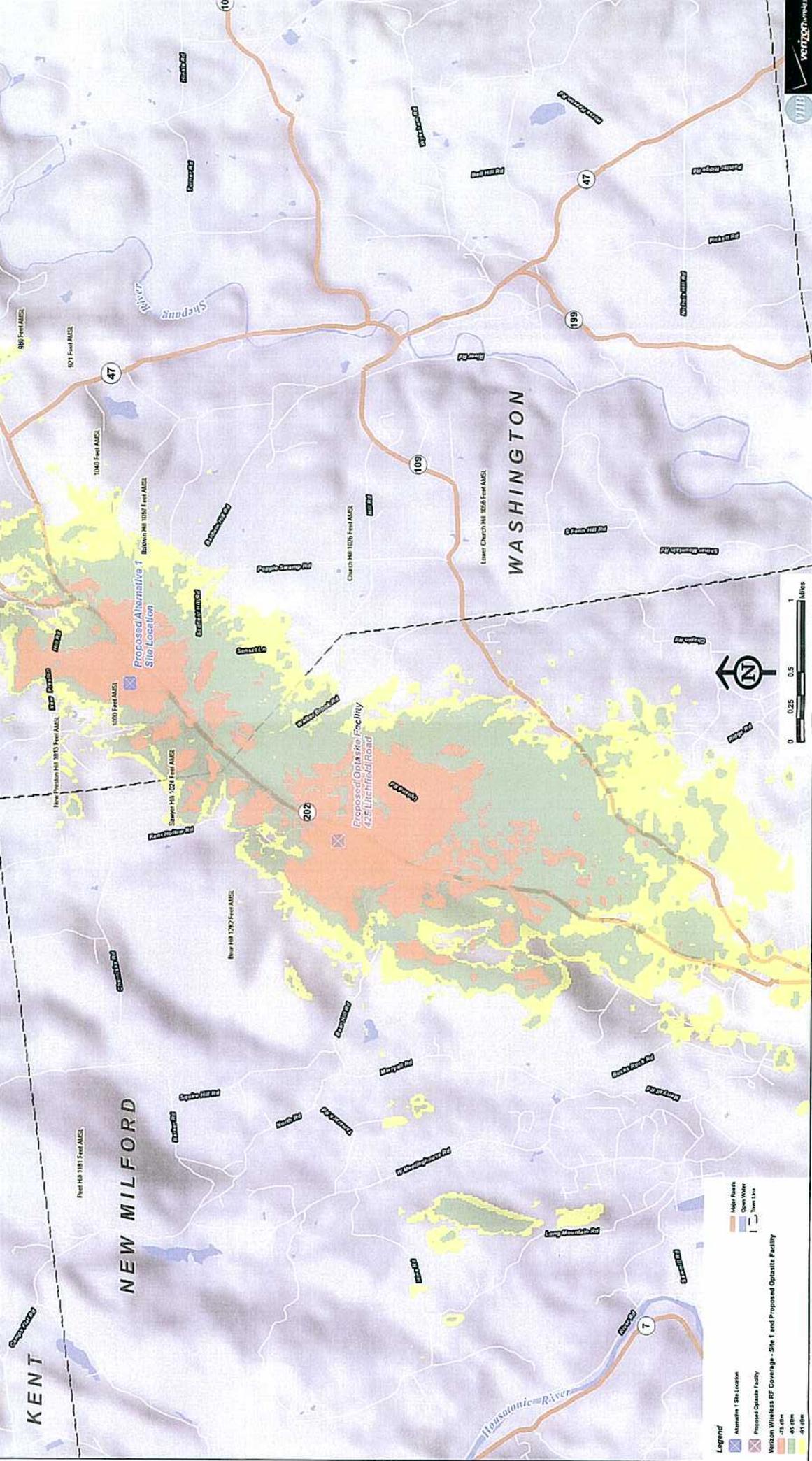
- Proposed Opasite Facility
- Alternative 1 Site Location
- Alternative 2 Site Location
- Verizon Wireless RF Coverage
- 75 dBm
- 68 dBm
- 51 dBm
- Major Roads
- Town Line



Docket No. 332
Connecticut Siting Council
Set 2 Interrogatory RF Coverage Plots (1:40,000 Scale)
Question No. 14 (a) - Proposed Site 1 at 150 Feet AGL and
Proposed Optasite 425 Litchfield Road Facility at 127 Feet AGL



Docket No. 332
Connecticut Siting Council
Set 2 Interrogatory RF Coverage Plots (1:40,000 Scale)
Question No. 14 (b) - Proposed Site 1 at 130 Feet AGL and
Proposed Optasite 425 Litchfield Road Facility at 127 Feet AGL



Legend

- X Alternative 1 Site Location
- X Proposed Optasite Facility
- █ Verizon Wireless RF Coverage - Site 1 and Proposed Optasite Facility
- █ -12 dBm
- █ -45 dBm
- █ -61 dBm

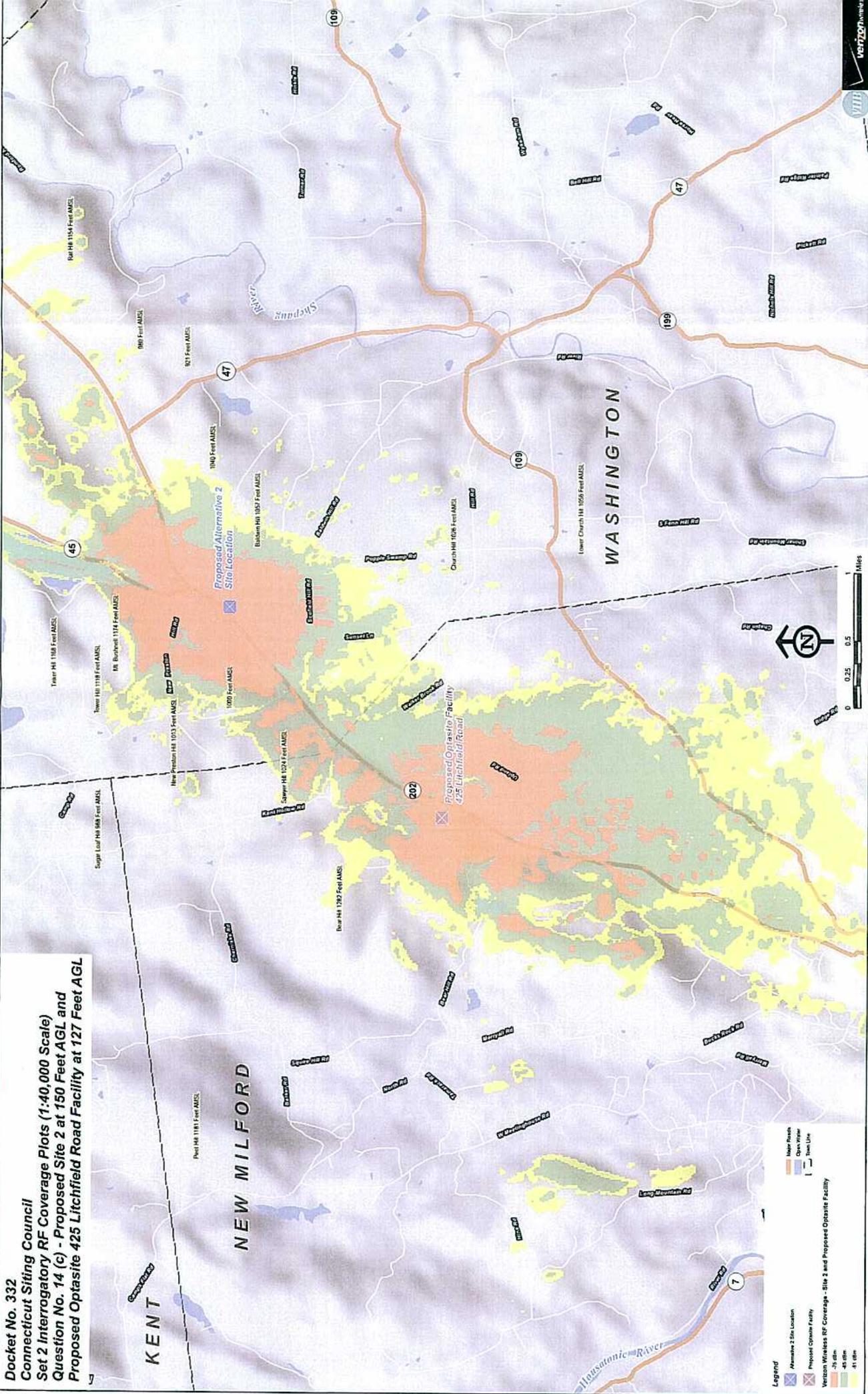
Map Symbols:

- █ Major Roads
- █ Minor Roads
- █ Water
- █ Shore Line

Scale: 0 0.25 0.5 1 Miles

North Arrow: N

Docket No. 332
Connecticut Siting Council
Set 2 Interrogatory RF Coverage Plots (1:40,000 Scale)
Question No. 14 (c) - Proposed Site 2 at 150 Feet AGL and
Proposed Optasite 425 Litchfield Road Facility at 127 Feet AGL



Legend

- Alternative 2 Site Location
- Proposed Optasite Facility
- Vermont Wireless RF Coverage - Site 2 and Proposed Optasite Facility
- 127 Feet AGL
- 150 Feet AGL
- Major Road
- Open Water
- Town Line



VERMONT

WASHINGTON

NEW MILFORD

KENT

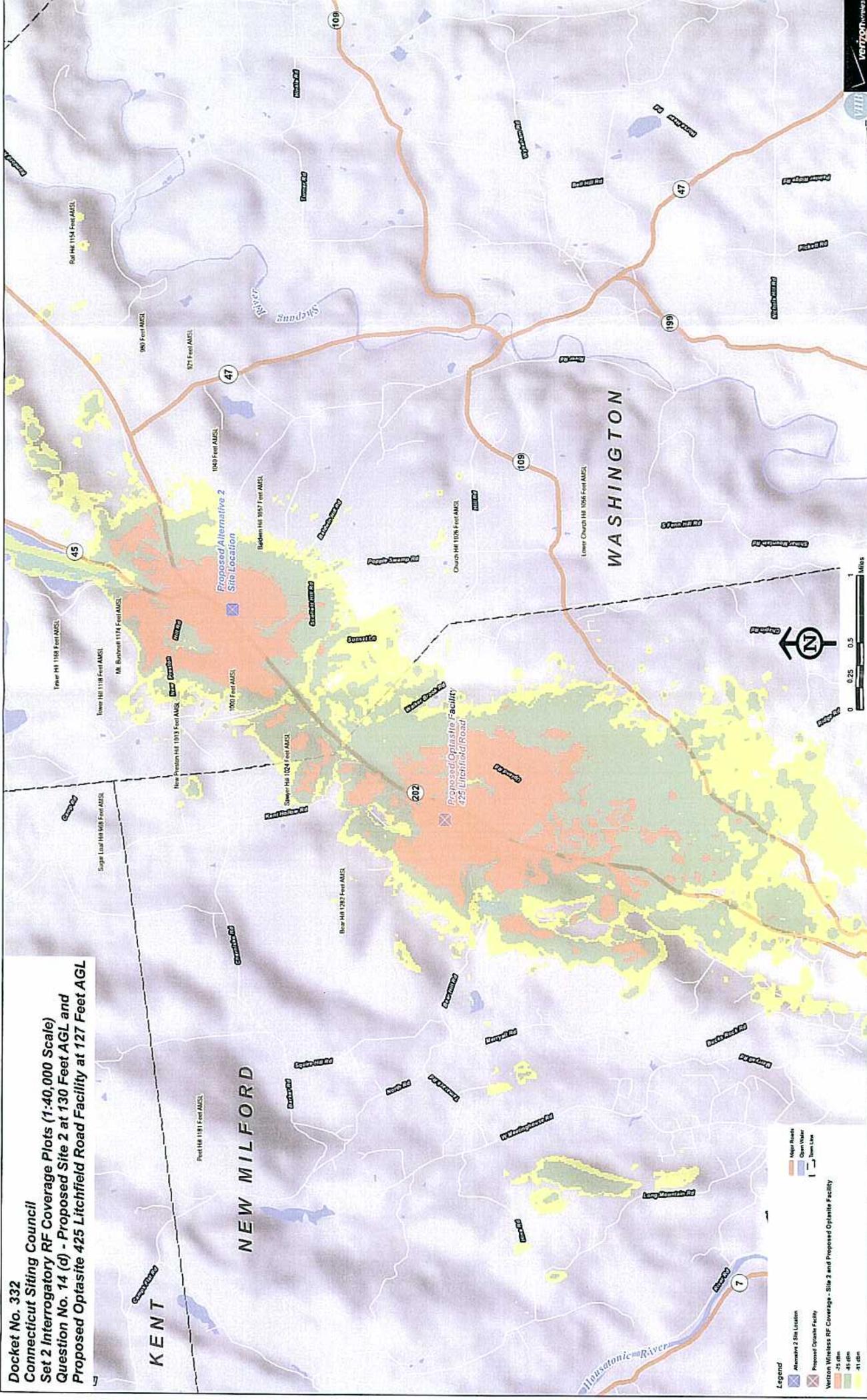
Proposed Optasite Facility
 425 Litchfield Road

Proposed Alternative 2
 Site Location

Proposed Site 2 at 150 Feet AGL

Proposed Optasite 425 Litchfield Road Facility at 127 Feet AGL

Docket No. 332
Connecticut Siting Council
Set 2 Interrogatory RF Coverage Plots (1:40,000 Scale)
Question No. 14 (d) - Proposed Site 2 at 130 Feet AGL and
Proposed Optasite 425 Litchfield Road Facility at 127 Feet AGL



Legend

- Alternative 2 Site Location
- Proposed Optasite Facility
- Verizon Wireless RF Coverage - Site 2 and Proposed Optasite Facility
- 25 dBm
- 45 dBm
- 61 dBm

Map Symbols:

- Water
- Open Water
- Dam Line



Verizon Wireless