

August 7, 2007

BY FIRST CLASS MAIL

Hon. Daniel F. Caruso, Chairman  
and Members of the Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051



Re: Cellco Partnership d/b/a Verizon Wireless  
Docket Number 332- Washington, Connecticut  
Intervenor New Cingular Wireless PCS, LLC (AT&T)

Dear Chairman Caruso and Members of the Council:

On behalf of New Cingular Wireless PCS, LLC ("AT&T"), please accept this letter in further support of Cellco Partnership d/b/a Verizon Wireless' ("Verizon") Certificate Application in Docket No. 332 and in lieu of a more formal brief. This letter is being submitted in accordance with the 30 day post-hearing time frame established by the Council for the receipt of any written comments, proposed findings of fact or briefs and outlines the reasons why AT&T believes that the record in this proceeding supports the public need for the proposed facility.

AT&T's Site Search Dates Back Over 5 Years

AT&T conducted its own search for a site to provide service in this area dating back several years. In 2002, AT&T Wireless, predecessor in interest to the current AT&T, sought approval from the Town of Washington to use a church steeple in the vicinity of the towers proposed in this Docket. The Town of Washington Planning & Zoning Commission denied AT&T Wireless's petition and expressly noted in its decision that the result would be the need for a new tower facility to provide service in this area of the Town. Thereafter, AT&T conducted its own search for a potential tower facility until its search ring was put on-hold in 2003. The record and testimony provided at the hearings clearly show that no facilities have been developed in this area of Town since AT&T's search for sites and as such, the need for the tower proposed in this docket still exists.

Public Need

1. Carriers

In addition to Verizon's testimony and information, Mr. John Blevins testified on behalf of AT&T that its existing sites cannot serve the gap in coverage along Route 202. AT&T's need for the proposed facility is supported by the baseline drive data for this area of the Town of Washington which was provided to the Council and clearly demonstrates that there is no reliable service in the area. Indeed, the coverage situation is so poor that AT&T will require at least one other site to the north and east to provide services in this area of the Town.

2. Town & Emergency Communications

The public need for a new tower facility in this area of the Town was also acknowledged by the Town's radio frequency witness, Mr. Walter Cooper, who testified that he prepared his own plots to verify the coverage data provided in the application. As Mr. Cooper clearly stated, his results were similar to the applicant's results. (July 10, 2007 hearing, pg. 69) Moreover, the representatives of the Town of Washington Fire Department testified regarding the urgent need for communication towers in the Town providing additional support for one of the towers proposed in this Docket. At the hearing on July 10, 2007, the Town's First Selectman also indicated that the Town's Highway Department would use the communications towers and would be "thrilled to have better coverage". (July 10, 2007 hearing, pg. 72)

### 3. Tower Design

At the hearings, both Mr. Blevins and Mr. Crotty explained the impact of a flush-mounted antenna design on the height of the proposed facility. Mr. Crotty testified that Verizon would require an additional ten (10) feet of height to provide adequate service at either proposed site. Mr. Blevins noted that AT&T would need two mounting levels in a flush-mounted configuration to account for future needs. Accordingly, based on this testimony, a monopole with flush mounted antennas, as requested by the Town, would likely require an additional height of 20 feet to accommodate the needs of the carriers in providing their services to the public.

### Conclusion

For all of the foregoing reasons, AT&T respectfully submits that the record in this proceeding fully supports the public need for a tower facility to serve Route 202 and surrounding areas in the Town of Washington. Accordingly, a certificate for construction of a tower facility should be issued to Verizon in order for Verizon, AT&T, and other wireless carriers to provide their services to the public and for the Town's Fire and Police Departments to improve their emergency communications networks within the Town.

Very truly yours,



Lucia Chiochio

cc: Kenneth C. Baldwin, Esq.  
Sandy Carter, Verizon Wireless  
Hon. Richard Sears, First Selectman, Town of Washington  
Steven R. Smart, Esq.  
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