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June 14, 2007

*Via Electronic Mail and U.S. Mail*

Robert Mercier  
Siting Analyst  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

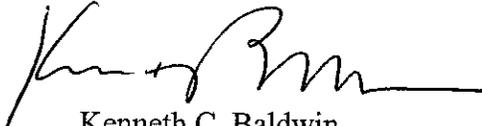
Re: **Docket No. 332 - Application for a Certificate of Environmental Compatibility and Public Need for the Construction, Maintenance and Operation of a Wireless Telecommunications Facility in Washington, Connecticut**

Dear Mr. Mercier:

Enclosed please find the applicant's Pre-Hearing Submission identifying its witnesses and current exhibit list.

Also enclosed are fifteen (15) copies of the resumes of Scott M. Chasse, Professional Engineer with All-Points Technology Corporation and Doug Drost with Natcomm, Inc. Mr. Chasse has been working with Natcomm, Inc. on this application and will appear as a witness on behalf of Cellco Partnership d/b/a Verizon Wireless.

Sincerely,



Kenneth C. Baldwin



*Law Offices*

BOSTON

HARTFORD

NEW LONDON

STAMFORD

WHITE PLAINS

NEW YORK CITY

SARASOTA

*www.rc.com*

KCB/kmd

Enclosures

Copy to:

Parties and Intervenors of Record

Sandy M. Carter

David A. Crotty

Michael Libertine, LEP

Scott M. Chasse

Doug Drost

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 WIRELESS :  
TELECOMMUNICATIONS FACILITY AT :  
ONE OF TWO LOCATIONS IN THE TOWN :  
OF WASHINGTON, CONNECTICUT : JUNE 14, 2007

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, Radio Frequency Engineer, Cellco Partnership

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

Scott M. Chasse, P.E. All-Points Technology Corporation

Doug Drost, Engineering Technician, Natcomm, Inc.

These witnesses will testify as to all matters covered in Cellco’s application 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 March 29, 2007, including attachments and the following bulk file exhibits:
  - a. Town of Washington Plan of Conservation and Development;
  - b. Town of Washington Inland Wetlands and Watercourses Regulations;
  - c. Town of Washington Zoning Regulations and map; and
  - d. Cellco's "Technical Report" dated January 19, 2007, filed with the Town of Washington.
2. Affidavit of Publication submitted to the Council on April 23, 2007 from the *Waterbury Republican-American*.
3. Notification Pursuant to C.G.S. § 16-50(i)(e) dated April 13, 2007.
4. Cellco's Responses to Pre-Hearing Interrogatories from the Council dated June 8, 2007.
5. Cellco's Responses to Pre-Hearing Interrogatories from the Town of Washington dated June 8, 2007.
6. Resume of Scott M. Chasse, P.E. with All Points Technology Corporation.
7. Resume of Doug Drost, Engineering Technician, Natcomm, Inc.

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

CERTIFICATE OF SERVICE

I hereby certify that on the 14<sup>th</sup> day of June, 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, 14<sup>th</sup> Floor  
White Plains, NY 10601

  
\_\_\_\_\_  
Kenneth C. Baldwin

**SCOTT M. CHASSE, P.E.**  
**3 SADDLEBROOK DRIVE KILLINGWORTH, CT 06419**  
**860-663-1697 860-663-0935**

**ALL-POINTS TECHNOLOGY CORPORATION (APT)** Dec. 2000 – Present

Mr. Chasse is a co-Founder of All-Points Technology Corporation (APT). He is an officer and Secretary of the Corporation. He provides hands-on design and permitting services to multiple wireless telecommunication carriers in CT and NY. Services include the development of zoning and construction drawings for installation of prefabricated equipment shelters and antennas on existing/new rooftops and tower structures. Mr. Chasse has participated in the design and development of over 700 wireless telecommunication projects during his tenure at APT.

**DIVERSIFIED TECHNOLOGY CORPORATION (DTC)** Mar. 1998- Dec. 2000

Mr. Chasse served as Director of Environmental and Telecommunication Departments while employed at DTC. He managed up to fourteen technical staff in completing over two hundred wireless telecommunication projects and several large-scale remedial investigations and compliance audits.

**SPRINT PCS** Oct. 1996- Mar. 1998

Mr. Chasse was employed as the Wireless Implementation Manager for the Connecticut and Western Massachusetts market during the carrier's initial coverage launch. He was responsible for the zoning, design, and construction of over 150 wireless telecommunication facilities during this time and managed over seventy contractors and staff.

**BERGER LEHMAN ASSOCIATES (BLA)** Dec.1994 – Oct. 1996

Mr. Chasse was the Chief Environmental Inspection and Auditor for a \$100mm CTDOT bridge project in Hartford, CT. He was responsible for enforcing contract performance with all environmental permits and regulations. Mr. Chasse collected samples and conducted in-situ analyses to verify contractor's compliance with remedial actions. Mr. Chasse also served as the Health and Safety Coordinator for the project and the Connecticut office of BLA.

**EDUCATION:** University of Connecticut, B.S. Civil Engineering 1992

**PROFESSIONAL ENGINEERING LICENSE(s):** Connecticut 1997 to present  
New York 2001 to present

**AFFILIATIONS:** Member of Chi-Epsilon (1992- present)  
Building Committee Member for new \$48mm RD17 School



**PROFILE**

Mr. Drost is an experienced detail oriented draftsman, well versed in all aspects of computer aided drafting and building design. In addition to providing on-site construction monitoring, Mr. Drost has multi-project managing experience with wireless design, local Housing Authorities and construction/renovation projects.

**EDUCATION**

BEI School of Engineering of Fairfield University,  
Fairfield, CT; Associates Degree, Mechanical  
Engineering

**REPRESENTATIVE PROJECTS**

**Verizon Wireless, AT&T, Cingular, Nextel:** Designer of over 300 telecommunication facilities including colocation, rawland, rooftop and specialty projects.

**West Haven Housing Authority;**

**Surfside 200 Heating Renovation:** CADD Designer, Clerk-of the Works and Assistant Project Manager for the twelve story elderly housing building.

**Greenwich Housing Authority;**

**Wilbur Peck Court Exterior Restorations:** Lead CADD Designer and Project Manager for multi-building masonry and site restorations.

**Quarry Knoll Community Building Upgrades:** Lead Architectural CADD Designer and Project Manager for multi-faceted interior and site upgrades project.

**Milford Housing Authority;**

**Foran Towers Building Envelope Evaluation:** Project Manager, Field Supervisor.

**WORK EXPERIENCE**

**NATCOMM INC; CADD DESIGN/PROJECT  
MANAGEMENT/ON-SITE MONITORING  
(6 YEARS)**

Responsible for the design and layout of numerous commercial design projects and wireless facilities. In addition to his ability to pay attention to detail and to troubleshoot, he is cognizant of the client's demands and schedule requirements. On-site construction monitoring. Project management and contract administration.

**MICHAEL JAMES CONTRACTING, INC.;**  
**FIELD ENGINEER  
(2 YEARS)**

Generation of CADD drawings for fabrication and design revisions. Materials procurement, site supervisor and project management support for various types of projects including masonry restoration, heavy mechanical replacement, health care facility additions and custom construction.