

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 3, 2007

SUPPLEMENTAL TESTIMONY OF WALTER COOPER

On June 21, 2007, I attended the hearing of the Siting Council on the above captioned application. Having reviewed the application and having heard the testimony of the applicant, I believe that the record in this matter is incomplete. In support of this contention I make the following observations:

1. The applicant was asked by the intervenor Town of Washington to provide all calculations regarding the RF radiation compliance of all potential transmitters at the proposed facilities. At the hearing, the applicant provided unsupported calculations of the maximum permissible exposure (MPE) which were clearly estimates. A proper analysis of the application requires that the actual calculations and assumptions be provided so that the Council and the Town of Washington can be certain that the application complies with the requirements of FCC Bulletin 65.

2. The applicant did not provide propagation maps for all potential sites, including the New Preston Fire Department, the land off Sunset Lane, the proposed Optasite facility in New Milford, and the power line site at the intersection of Route 45 and 202. This information is essential in an evaluation as to whether the siting of a tower at either of the proposed sites is appropriate.

3. Despite two (2) requests from the Town of Washington, the applicant has failed to provide a gap map. It is clear from the testimony that, while the applicant initially indicated that there was no cell service in the Town of Washington, cell service already exists in some areas. Beyond a brief statement in the application that "Cellco's network currently experiences significant gaps in coverage along Route 202 and along the local roads in the northwesterly portion of Washington", the applicant has not provided a description of its coverage needs throughout the Town nor has it provided information concerning its plans to meet those needs. The Siting Council and the Town need a more complete understanding of the applicants' overall needs in the Town to

judge the appropriateness of the application now before the Council so that it can be determined whether it will complement or duplicate future coverage.

4. Despite a request from the Town, Cellco has failed to provide a rendering (photo or graphic simulations) of a slender monopole containing flush mount antennas. At the portion of the hearing that was open to the public, a number of citizens expressed their concerns about the appearance of the tower. A rendering of the slender monopole with flush mount antennas should be provided so that the public can be fully informed.

5. During the public hearing, the applicant made reference to the use of EIA/TIA – 222F structural standards in the construction of its facilities. The most recent standard is 222G which has more stringent requirements for wind and ice loading than the older standard. Given the public concern expressed about the structural safety of the proposed facility, the applicant should be required to demonstrate that its design has been made in accordance with the newer standard.

6. The applicant was asked to provide dropped call data from adjacent sites in order to give the Siting Council and the Town a more complete understanding of the extent and significance of Cellco's coverage gaps in the Town. Although the applicant acknowledged it had this information, it was not provided to the Town or the Council.

7. In the public hearing the applicant stated that, unless required to do so, it does not monitor its facilities for compliance with FCC regulations. Rather, it claimed, that the FCC provides this service. This statement is highly misleading and could leave the Siting Council, the Town and its citizens with the false impression that there is routine safety monitoring conducted by the FCC. The FCC has extremely limited resources for RF monitoring and only responds to specific complaints.

Respectfully submitted on behalf of
Walter A. Cooper, witness for the Town of
Washington

By _____
Steven R. Smart, Attorney for
Town of Washington