

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

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Application of National Grid Wireless, Inc.
For a Certificate of Environmental
Compatibility and Public Need for the
Construction, Maintenance and Operation of
a Telecommunications Facility at 17 Cottage
Road in the Town of Madison

Docket 333 CONNECTICUT
SITING COUNCIL

July 20, 2007 ORIGINAL

POST-HEARING BRIEF OF OMNIPOINT COMMUNICATIONS, INC.

Pursuant to § 16-50j-31 of the Regulations of Connecticut State Agencies (“R.C.S.A.”), Intervenor Omnipoint Communications, Inc., a subsidiary of T-Mobile USA, Inc., d/b/a T-Mobile (hereinafter “T-Mobile”) submits this post-hearing brief in support of the above-captioned application. This brief is limited to (1) the public need for this telecommunications facility. Intervenor T-Mobile also submits its Proposed Findings of Fact in conjunction with this Post-Hearing Brief.

I. **BACKGROUND**

The applicant, National Grid Wireless, Inc., (the “Applicant”) in accordance with provisions of Connecticut General Statutes (“C.G.S.”) §§ 16-50g through 16-50aa and §§ 16-50j-1 through 16-50j-34 of the Regulations of Connecticut State Agencies (“R.C.S.A.”), applied to the Connecticut Siting Council (“Council”) on March 30, 2007 for a Certificate of Environmental Compatibility and Public Need (“Certificate”).

The Applicant proposes to construct a 130-foot steel monopole telecommunications facility in the northwest corner of a 1.8 acre parcel of land owned by Paul Stonehart known at 17 Cottage Road in Madison, Connecticut (the “Site”).

The 62.5-foot by 64-foot leased area will include a 60-foot by 60-foot fenced compound area at the Site ("Facility"). This Facility will be designed to accommodate the antenna arrays and associated equipment of T-Mobile and the equipment of three (3) other telecommunications carriers. Verizon Wireless has expressed an interest in co-locating on the Facility. See Verizon Wireless Letter dated July 5, 2007.

The purpose of this Facility is to provide wireless telecommunications services to Madison along Route 1, the Hammonasset Connector, Interstate I-95 and surrounding areas. See Pre-filed Testimony of Scott Heffernan. T-Mobile currently experiences significant gaps in coverage and inadequate coverage in the area. In particular, T-Mobile experiences a coverage gap of 3.06 miles along Route 1, 1.09 miles along the Hammonasset Connector and .65 miles along Interstate I-95. See T-Mobile Interrogatory Responses dated June 12, 2007. A Facility at the Site will provide wireless coverage service to this area which is currently experiencing inadequate coverage. Id.

II. A SIGNIFICANT PUBLIC NEED EXISTS FOR A TELECOMMUNICATIONS FACILITY IN THIS AREA

A. T-Mobile's Need

Connecticut General Statute ("C.G.S.") §16-50p(a) mandates that the Council "shall not grant a certificate, either as proposed or as modified by the council, unless it shall find and determine: (1) A public need for the facility and the basis of the need..." C.G.S. §16-50p(a). There can be no dispute that there is a significant public need for this Facility.

There are no other telecommunications facilities in this area of Madison and no utility structures or other suitably tall structures on which to locate a telecommunications facility.

T-Mobile has established that it is currently experiencing significant coverage gaps along Route 1, the Hammonasset Connector and Interstate I-95 as well as the surrounding area which result in inadequate coverage in this area. These communications issues can be alleviated with the construction of this Facility, which will provide benefits for both the residents and businesses in Madison. As demonstrated by T-Mobile's testimony and propagation maps, a Facility at the proposed Site will alleviate that inadequacy. See T-Mobile Exhibit 1.

III. CONCLUSION

It is clear from the evidence presented in the docket that approval of the Facility in this area of Madison is necessary to provide adequate wireless coverage. T-Mobile has demonstrated that utilization of the Property provides the optimal solution for the lack of coverage in this area. As such, T-Mobile respectfully urges the Council to issue a Certificate for the proposed Facility.

Respectfully submitted,

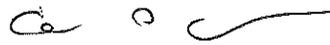
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Certification

This is to certify that a copy of the foregoing has been mailed, this date to all parties and intervenors of record.

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