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CONNECTICUT
SITING COUNCIL

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF OPTASITE TOWERS LLC
AND OMNIPOINT COMMUNICATIONS, INC.
FOR A CERTIFICATE OF ENVIRONMENTAL
COMPATIBILITY AND PUBLIC NEED FOR
THE CONSTRUCTION, MAINTENANCE AND
OPERATION OF A TELECOMMUNICATIONS
FACILITY AT 640 HILLIARD STREET
MANCHESTER, CONNECTICUT

DOCKET NO. 339

Date: AUGUST 7, 2007

**INTERROGATORY RESPONSES TO CONNECTICUT SITING COUNCIL
FROM CO-APPLICANTS OPTASITE TOWERS LLC AND OMNIPOINT
COMMUNICATIONS, INC.**

Co-applicants Optasite Towers LLC ("Optasite") and Omnipoint Communications, Inc. ("T-Mobile") submit the following responses to the interrogatories from the Connecticut Siting Council in connection with the above captioned Docket.

Q1. Provide the Affidavit of Publication for the published legal notices that were published in The Hartford Courant and The Journal Inquirer.

A1. See Affidavits of Publication attached hereto as Exhibit 1.

Q2. Did the Applicants receive return receipts for all adjacent landowners listed behind Tab F of the application? If not, was any additional effort made to make sure notice was received?

A2. The Applicants have received return receipts for four of the five abutting landowners. The Applicants sent a second certified mailing to the remaining abutter on June 18, 2007. The Applicants will send a third (and final) mailing to the remaining abutters on or before August 10, 2007.

Q3. Describe negotiations and conversations with owners of property at 642 Hilliard Street regarding leasing space.

A3. At the request of Mr. Pellegrini, the Director of Planning and Economic Development for the Town of Manchester, Optasite met with the owners of

Hilliard Mills, LLC located at 642 Hilliard Street. After meeting with the owners Optasite located space in which a tower could be placed and forwarded a standard lease agreement to the owners. After several attempts, Optasite was unable to reach any reasonable leasing agreement with the owners of Hilliard Mills and it became clear that the owners of that property were not interested in leasing space for the development of the proposed Facility.

Q4. When did Optasite first establish a search area for the proposed site?

A4. January, 2006.

Q5. What was the size and shape of the search area?

A5. See copy of site search map attached hereto as Exhibit 2.

Q6. On what structures, shown behind Tab H, is T-Mobile located or proposes to be located? At what height?

A6. T-Mobile is located on the following structures identified in Tab H:

1. Crown Castle 1455 Forbes Street, East Hartford
Antenna Height: 87' AGL (Existing: T-Mobile Site # CT11186A)
4. SBA Properties, Inc 151 Sand Hill Road, South Windsor
Antenna Height: 160' AGL (Existing: T-Mobile Site # CT11497A)
8. Town of East Hartford 100 Sunset Ridge, East Hartford
Antenna Height: 120' AGL (Existing: T-Mobile Site # CT1737C)
9. Voicestream 205 Spencer Street, Manchester
Antenna Height: 123' AGL (Existing: T-Mobile Site # CT11138F)
11. Sprint 55 Slater Street, Manchester
Antenna Height: 133' AGL (Existing: T-Mobile Site # CT11377C)
14. Optasite Towers, LLC 1027 Middle Turnpike East, Manchester
Antenna Height: 127' AGL (Proposed: T-Mobile Site # CTHA075C)

15. MCF 12 Carp enter Road, Bolton

Antenna Height: 127' AGL (Proposed: T-Mobile Site # CTHA076D)

Q7. What is the distance of each of the existing structures, listed behind Tab H, from the proposed site?

A7.	1. Crown	4.70 miles
	2. Mega	.66 miles
	3. Hartford	2.29 miles
	4. SBA	3.54 miles
	5. E. Hartford	3.12 miles
	6. Marcus	3.30 miles
	7. SNET	2.58 miles
	8. E. Hartford	2.21miles
	9. Voicestream	1.31 miles
	10. BAM	1.36 miles
	11. Sprint	1.69 miles
	12. Thornton	.68 miles
	13. Manchester	2.04 miles
	14. Optasite (328)	3.81 miles
	15. MCF (323)	4.47 miles

Q8. Would flush mounted antennas remain adequate for T-Mobile's objectives with potential increased need for capacity in the area?

A8. Based on existing and near term forecasted traffic data for this particular site, T-Mobile would be able to satisfactorily handle the anticipated traffic with flush mount antennas.

Q9. Is any blasting expected to be necessary for the construction of the proposed site?

A9. No blasting is anticipated.

Q10. What is the land use of each adjacent property onto which the tower setback radius extends?

A10. 642 Hilliard Street – Zoned Industrial, old mill, being renovated for tenants
318 Adams Street – Zoned Industrial, gas station
330 Adams Street – Zoned Industrial, gas station
370 Adams Street – Zoned Industrial, vacant land

340 Adams Street – Zoned Industrial, commercial use - warehouse & house

Q11. Would Optasite be willing to install a yield point in the proposed tower to allow the tower setback radius to remain within the host property?

A11. Yes Optasite has designed the proposed Facility with a pre-engineered yield point, as shown in Exhibit B of the Certificate Application.

Q12. How many residences are within a 1,000 foot radius of the proposed site?

A12. There are 44 residences within a 1,000' radius.

Q13. What is the distance and direction of the nearest residence to the proposed site?

A13. The nearest residence is 380' to the south.

Q14. Do the costs listed on page 21 of the application include radio equipment and antennas?

A14. No, the costs do not include any equipment or antennas.

Q15. Was the E.E. Hilliard Woolen Mill located on the host property of the proposed site?

A15. No, E.E. Hilliard Woolen Mill was located on the adjacent parcel, 642 Hilliard Street. As noted in Exhibit N of the Application, the E.E. Hilliard Woolen Mill is listed on the National Historic Register. However, the State Historic Preservation Office has determined that the proposed Facility will have no adverse impact on this historic resource. See Exhibit N of the Certificate Application.

Q16. What is the distance and direction of the nearest wetland to the proposed site?

A16. The nearest wetland is 114' to the south.

Q17. What is the distance and direction of the nearest airport to the proposed site?

A17. The closet, active airport is Hartford-Brainard Airport, which is 5.7 miles southwest of the proposed site.

Q18. Provide T-Mobile's Federal Communications Commission licensed frequency band.

A18. T-Mobiles FCC Licensed frequencies for this area (Hartford BTA) are as follows:

Transmit: 1935.000 MHz to 1945.000 MHz

Receive: 1855.000 MHz to 1865.000 MHz

Q19. What is T-Mobile's minimum signal level threshold to provide adequate coverage to the target area? Provide both the in-building and the in-vehicle thresholds.

A19. T-Mobile's minimum design receive signal level threshold is -84 dBm. This level is the lower limit to where T-Mobile can provide reliable in vehicle coverage to its network users. A more robust signal level is required to provide reliable coverage to subscribers inside building structures. The lower limit for T-Mobile's in-building design is -76 dBm for average residential and business dwelling environments.

Q20. What is the length of the existing T-Mobile coverage gap along Route 6 in the target area? What is the length of the coverage gap along Middle Turnpike West?

A20. The length of the existing T-Mobile coverage gap along Route 6 in the targeted area is 1.2 miles.

The length of the existing T-Mobile coverage gap along Middle Turnpike West is 0.75 miles.

Q21. What is currently in the location of the proposed utility easement? Will any obstacles have to be removed or clearing take place for the installation of utilities to the site?

A21. The area along the proposed utility easement is currently open space used for parking. No obstacles will need to be removed and no clearing will need to take place for installation of the utilities. Vehicles will have to temporarily park in another area during installation of utilities.

Q22. Could landscaping around the proposed site be installed in a staggered formation? What is the type and height of trees to be installed?

A22. Yes, landscaping could be staggered around the compound with the exception of the south end of the compound, where the Property owners utilize area immediately adjacent to the compound to gain access to the existing building on the Property. Optasite proposes to install 4-6' white pines or arborvitae but is amenable to any landscaping suggestions the Council may have.

Q23. Does T-Mobile currently use fuel cells as back up generators at any of its Connecticut tower sites? If yes, how many?

A23. T-Mobile does not currently have any sites in Connecticut using fuel cells as a back up power source.

Q24. Does T-Mobile plan to use a fuel cell at the proposed site or have any plans to install a fuel cell at any existing or future sites in Connecticut?

A24. T-Mobile does not have plans to install any fuel cells at any existing or future sites in Connecticut at the present time.

Q25. Would T-Mobile be willing to use a fuel cell at the proposed site as a back up generator, if ordered by the Council?

A25. T-Mobile is currently investigating the use of fuel cells as an alternate back up power source. However, at this time, T-Mobile's corporate headquarters has not approved any fuel cells as acceptable and reliable power sources. T-Mobile will be willing to utilize fuel cells once they are fully tested and approved.

Q26. Would coverage from the proposed facility interact with a facility in the area of 1027 Middle Turnpike East in Manchester?

A26. Except in in some of the outer lying fringe coverage areas where the terrain may cause a better line of site, this proposed Facility will not interact with the proposed facility at 1027 Middle Turnpike East in Manchester (Council Docket 328).

Affidavit of Publication

State of Connecticut }
County of Hartford } ss. Manchester

I, Donna Chiapponi, do solemnly swear that I am Classified Bookkeeper of the Journal Inquirer printed and published at Manch. in the State of Connecticut and that from my own personal knowledge and reference to the files of said publication the advertisement of Legal Notice for Town of Manchester Public Notice to Connecticut Siting Council

.....
Please see attached tear sheet(s)
.....

was inserted in the regular editions on dates as follows: 5/15/07, 5/17/07

.....
Donna Chiapponi

.....
Billing Department

.....
Donna Chiapponi

Subscribed and sworn to before me this 24th day of May, 2007.

{ Seal }

Karin E. Walsh
KARIN E. WALSH Notary Public
NOTARY PUBLIC
MY COMMISSION EXPIRES 07/31/2009

FORD EXPLORER '99, XLS, 4 Dr, 4x4, AT, A/C, loaded. Black w/chrome factory wheels. 99k. Mint. \$5450. Call 860-653-0179

WD, AC, 6 CD, heated air seats, sunroof, all power, 101k, exc cond, \$9,500. Call all epm 860-653-3595

CHEVY NOVA '77, mint condition, exhaust/intake, fully restored, \$5,900 firm. Call 872-8996 or 936-9579

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AEROCO Hybrid Truck, ba, micro, outdr/stw, \$8500. Exc

BOUNDER Ford V-10, 132 miles, Near condition, \$850-749-78

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CHEVY Van Clean, G 860-763-

CHEVY V6 50k, Nice Car/Place

CHRYSL Country 44kmi, leather, loaded S

DODGE G ac, stereo, Enfield St

DODGE G all pwr gre field St Au

DOLPHIN 34 ft, tw qu bed, monitor, Portable, 648-217

FORD E2 White, g brakes, \$14,500 WebPhot

SANDEP 29 ft, will include ing, \$8, (561) 413-

PUBLIC NOTICE

PUBLIC NOTICE

Notice is hereby given, pursuant to Section 16-501(b) of the Connecticut General Statutes and Section 16-501-1(a) of the Regulations of Connecticut State Agencies of an Application to be submitted to the Connecticut Siting Council ("Siting Council") on or after May 18, 2007 by Optasite Towers LLC and Omnipoint Communications, Inc., a subsidiary of T-Mobile USA, Inc. d/b/a T-Mobile ("T-Mobile") (collectively the "Applicants"). The Applicants will request a certificate of environmental compatibility and public need from the Siting Council for the construction, maintenance and operation of a telecommunications facility in Manchester, Connecticut. The Applicants are proposing to construct a new monopole tower at 640 Hilliard Street, Manchester, Connecticut and is owned by 640 Hilliard Street, LLC (the "Property"). The Applicants propose to construct a new 160' self-supporting monopole tower, antennas, associated equipment and other site improvements integral to a wireless communications facility. The location, height and other features of the proposed facility are subject to review and potential change under provisions of the Connecticut General Statutes § 16-50g et. seq.

The proposed Facility will provide service in the Town of Manchester the neighborhoods east of Interstate I-94 and north of US Highway 6 and in adjacent areas, which do not have adequate service. The Application will explain the need, purpose and benefits of the facility and will also describe the environmental impacts of the proposed facility.

A balloon representative of the proposed height will be flown on the day of the Siting Council public hearing on the Application, which will take place in the Town of Manchester. The balloon will be flown from approximately 8 a.m. to 6 p.m. Notice of the public hearing date will be provided by the Siting Council.

Interested parties and residents of the Town of Manchester are invited to review the Application during normal business hours at any of the following offices:

Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Town Clerk
41 Center Street
Manchester, CT 06045-0191

or the offices of the undersigned. All inquiries should be addressed to the Connecticut Siting Council or to the undersigned.

Julie D. Kohler, Esq.
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1115 Broad Street
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Fax (203) 394-9901
Attorneys for the Applicant

Journal Inquirer
May 15, 2007
May 17, 2007



The Hartford Courant.

A TRIBUNE PUBLISHING COMPANY

Affidavit of Publication

State of Connecticut

Wednesday, May 16, 2007

County of Hartford

I, Joy Shroyer, do solemnly swear that I am Financial Operations Assistant of the Hartford Courant, printed and published daily, in the state of Connecticut and that from my own personal knowledge and reference to the files of said publication the advertisement of Public Notice was inserted in the regular edition.

On dates as follows: 05/16/2007
05/14/2007

COHEN AND WOLF P.C.
070656
Full Run

640 HILLIARD

Financial Operations Assistant
Joy Shroyer

Subscribed and sworn to before me on May 16, 2007

Notary Public

LISA CARDINI
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 30, 2011

NOTICE

Notice is hereby given, pursuant to Section 16-501(b) of the Connecticut General Statutes and Section 16-501-1(e) of the Regulations of Connecticut State Agencies of an Application to be submitted to the Connecticut Siting Council ("Siting Council") on or after May 18, 2007 by Optasite Towers LLC and Omnipoint Communications, Inc., a subsidiary of T-Mobile USA, Inc. d/b/a T-Mobile ("T-Mobile") (collectively the "Applicants"). The Applicants will request a certificate of environmental compatibility and public need from the Siting Council for the construction, maintenance and operation of a telecommunications facility in Manchester, Connecticut. The Applicants are proposing to construct a new monopole tower at 640 Hilliard Street, Manchester, Connecticut and is owned by 640 Hilliard Street, LLC (the "Property"). The Applicants propose to construct a new 150' self-supporting monopole tower, antennas, associated equipment and other site improvements integral to a wireless communications facility. The location, height and other features of the proposed facility are subject to review and potential change under provisions of the Connecticut General Statutes § 16-50g *et. seq.*

The proposed Facility will provide service in the Town of Manchester the neighborhoods east of Interstate I-84 and north of US Highway 6 and in adjacent areas, which do not have adequate service. The Application will explain the need, purpose and benefits of the facility and will also describe the environmental impacts of the proposed facility.

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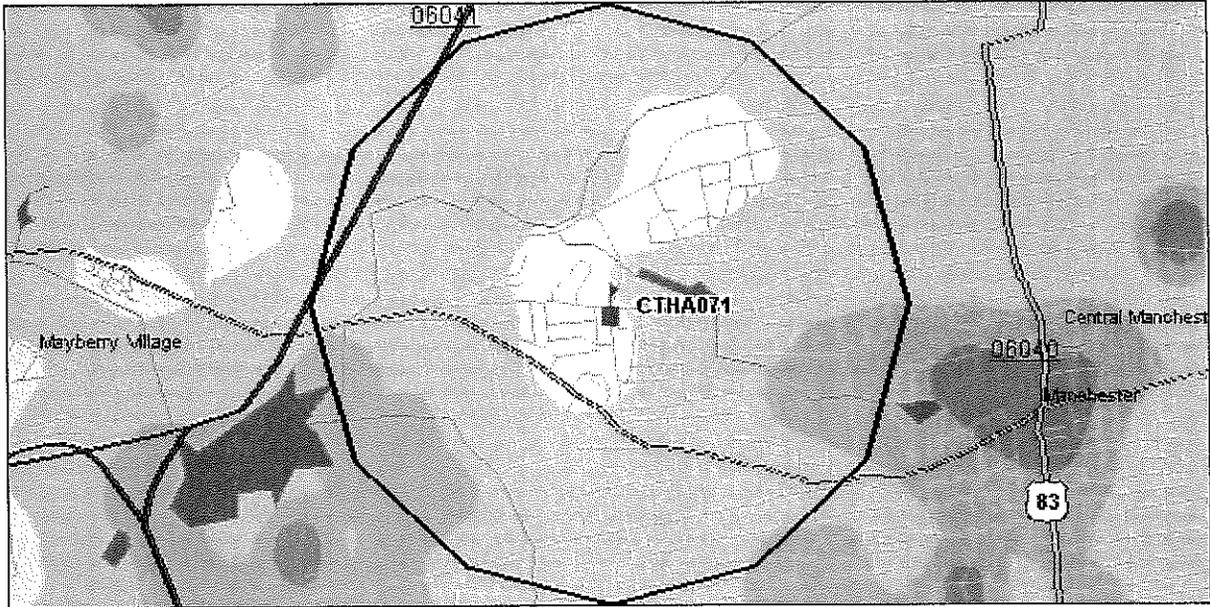
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Julie D. Kohler, Esq.
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Cohen and Wolf, P.C.
1115 Broad Street
Bridgeport, CT 06604
Tel. (203) 368-0211
Fax (203) 394-9901
Attorneys for the Applicant

CTHA071 Manchester AdamsSt



Respectfully Submitted,

By:  _____

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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.



Carrie L. Larson