

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
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 APPLICATION OF MCF COMMUNICATIONS : DOCKET NO. 344  
 bg, INC. AND OMNIPOINT :  
 COMMUNICATIONS, INC. FOR A :  
 CERTIFICATE OF ENVIRONMENTAL :  
 COMPATIBILITY AND PUBLIC NEED FOR :  
 THE CONSTRUCTION, MAINTENANCE AND :  
 OPERATION OF A TELECOMMUNICATIONS :  
 FACILITY OFF RICH ROAD, THOMPSON, :  
 CONNECTICUT : OCTOBER 26, 2007

POST HEARING BRIEF OF INTERVENOR  
CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS

On July 27, 2006, MCF Communications bg, Inc. (“MCF”) and Omnipoint Communications, Inc. (“OCP”) (collectively the “Applicant”) submitted an application to the Connecticut Siting Council (“Council”) for a certificate of environmental compatibility and public need for the construction, maintenance and operation of a telecommunications facility in the Town of Thompson, Connecticut. The proposed facility would be located on a eight acre parcel owned by the Town of Thompson and located off Rich Road. (Applicant’s Exhibit (“Exh.”) 1 p. 2).

On August 29, 2007, the Council granted intervenor status to Cellco Partnership d/b/a Verizon Wireless (“Cellco”). Cellco had identified a need to provide improved cellular and PCS service to its customers in the north Thompson area and identified the proposed MCF facility as a structure that could help satisfy that need. In support of its position, Cellco responded to

interrogatories from the Council on October 3, 2007 and provided testimony at the Council's October 11, 2007 public hearing.

#### The Cellco Facility

The Cellco facility would consist of 12 panel-type antennas (six cellular and six PCS) mounted at the 137-foot level on the 150-foot MCF tower. Cellco's equipment would be installed in a 12-foot by 30-foot equipment shelter located near the base of the tower within the facility compound. (Cellco Exh. 1, Response Nos. 2 and 10). Cellco would also install a back-up, diesel-fueled generator in a segregated 12-foot by 10 foot generator room within its equipment shelter. (Id.)

#### Cellco's Need

Cellco currently experiences a 1.2 mile coverage gap at cellular frequencies and a 2.3 mile coverage gap at PCS frequencies along I-395 between its existing Thompson cell site and its existing Webster 2 cell site in Massachusetts. (Cellco Exh. 1 Response Nos. 5 and 6). The Docket No. 344 record contains ample written evidence and testimony that Cellco antennas at the 137-foot level on the proposed 150-foot tower would provide quality wireless service and satisfy Cellco's immediate need for coverage in northern Thompson. The proposed Cellco facility would provide coverage to a 2.97 mile portion of I-395 at cellular frequencies and a 1.99 miles portion of I-395 at PCS frequencies. (Cellco Exh. 1 Response No. 7). The Cellco facility will provide coverage to an overall area of approximately 9.8 square miles at cellular frequencies and 4.4 square miles at PCS frequencies. (Cellco Exh. 1 Response No. 8). The proposed site would fill the existing cellular and PCS coverage gaps along I-395. (Cellco Exh. 1, Response No. 6).

Conclusion

The evidence in the Docket No. 344 record supports Cellco's need for the installation of antennas on the proposed MCF tower. The MCF tower as proposed in the Docket No. 344 application will provide Cellco with significant coverage relief in the Thompson area, in particular, along the heavily traveled I-395. This evidence remains unrefuted. Cellco therefore respectfully request that the Council approve MCF's Docket No. 344 application.

Respectfully submitted,  
CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS

By   
Kenneth C. Baldwin, Esq.  
Robinson & Cole LLP  
280 Trumbull Street  
Hartford, CT 06103-3597  
Its Attorney

**CERTIFICATION**

I hereby certify that on the 26<sup>th</sup> day of October, 2007, a copy of the foregoing was mailed,  
postage prepaid, to the following:

Carrie L. Larson, Esq.  
Cohen and Wolf, P.C.  
1115 Broad Street  
P.O. Box 1821  
Bridgeport, CT 06604-4247



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Kenneth C. Baldwin