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November 30, 2007

TO: Parties and Intervenors

FROM: S. Derek Phelps, Executive Director

RE: **DOCKET NO. 344 - MCF Communications bg, Inc and Omnipoint Communications, Inc.** application for a Certificate of Environmental Compatibility and Public Need for the construction, maintenance and operation of a telecommunications facility located at Rich Road, Thompson, Connecticut.

As stated at the hearing in Thompson on October 11, 2007, after the Council issues its draft findings of fact, parties and intervenors may identify errors or inconsistencies between the Council's draft findings of fact and the record; however, no new information, evidence, argument, or reply briefs will be considered by the Council.

Parties and Intervenors may file written comments with the Connecticut Siting Council on the Draft Findings of Fact issued on this docket by December 13, 2007.

SDP/cm

Enclosure

DOCKET NO. 344 - MCF Communications bg, Inc and } Connecticut
Omnipoint Communications, Inc. application for a Certificate of }
Environmental Compatibility and Public Need for the } Siting
construction, maintenance and operation of a telecommunications }
facility located at Rich Road, Thompson, Connecticut. } Council

November 26, 2007

DRAFT

Findings of Fact

Introduction

1. MCF Communications bg, Inc. (MCF) and Omnipoint Communications, Inc. a subsidiary of T-Mobile USA, Inc. (T-Mobile), collectively referred to as the "Applicants," in accordance with provisions of Connecticut General Statutes (CGS) § 16-50g through 16-50aa, applied to the Connecticut Siting Council (Council) on July 27, 2007 for the construction, operation, and maintenance of a wireless telecommunications facility on Rich Road in Thompson, Connecticut. (Applicants 1, p. 1)
2. MCF Communications is a stock corporation organized under the laws of the Commonwealth of Massachusetts. MCF Communications bg, a subsidiary of MCF Communications, develops, owns, manages, and markets communication sites in New England for wireless communication companies. (Applicants 1, p. 3)
3. T-Mobile is a Delaware Corporation and a federally licensed provider of wideband PCS services in the State of Connecticut and other areas. (Applicants 1, p. 3)
4. The parties in this proceeding are the Applicants. Cellco Partnership d/b/a Verizon Wireless (Cellco) is an intervenor. (Transcript, October 11, 2007, 3:05 p.m. [Tr. 1], p. 6)
5. The proposed facility would provide coverage in the Town of Thompson, along Interstate I-395 as well as adjacent areas. (Applicants 1, p. 1)
6. Pursuant to CGS § 16-50m, the Council, after giving due notice thereof, held a public hearing on October 11, 2007, beginning at 3:05 p.m. and continuing at 7:00 p.m. in the Merrill Seney Community Room of the Thompson Town Hall, 815 Riverside Drive, North Grosvenor Dale, Connecticut. (Tr. 1., p. 3)
7. Pursuant to CGS § 16-50l(b), public notice of the application was published in the Norwich Bulletin on July 24 and 26, 2007 and the Thompson Villager on July 27, 2007. (Applicants 1, p. 4; Norwich Bulletin Affidavit of Publication dated July 24, 2007; Stonebridge Press Affidavit of Publication dated August 9, 2007)
8. The Council and its staff conducted an inspection of the proposed site on October 11, 2007, beginning at 2:00 p.m. The applicant flew a balloon from 8:00 a.m. until approximately 7:00 p.m. at the proposed site to simulate the height of the proposed tower. Weather conditions for the balloon flight were breezy all day making it difficult for the balloon to fly at the 150-foot height of the proposed tower. (Tr. 1, pp. 17-18)

9. Pursuant to CGS § 16-50I(b), notice of the application was provided to all abutting property owners by certified mail. (Applicants 1, p. 5)
10. The Applicants received return receipts from all property owners to whom notice was sent. (Applicants 2, A1)
11. Pursuant to CGS § 16-50I(b), the Applicants provided notice to all federal, state and local officials and agencies listed therein. (Applicants 1, p. 4; Exhibit C)
12. On September 26, 2007, MCF posted a 4-foot by 6-foot sign on the town's property where its facility would be located. The sign notified the public of its pending application and provided notice of the scheduled public hearing. (Applicants 3, Pre-filed testimony of Brad Gannon, A10)

State Agency Comments

13. Pursuant to CGS § 16-50I, the Council solicited comments on the application from the following state departments and agencies: Department of Environmental Protection, Department of Public Health, Council on Environmental Quality, Department of Public Utility Control, Office of Policy and Management, Department of Economic and Community Development, and the Department of Transportation. The Council's letters requesting comments were sent on September 7, 2007 and on October 12, 2007. (CSC Hearing Package dated September 7, 2007 and Letter to State Agency heads dated October 12, 2007)
14. The Connecticut Department of Transportation (ConnDOT) responded to the Council's solicitation with no comments. (ConnDOT Letter undated)
15. Other than the letter from ConnDOT, no comments were received from any state agency. (Record)

Municipal Consultation

16. On September 25, 2006, MCF submitted a technical report to Town of Thompson officials. The report described the development of a wireless telecommunications facility that would have been located on private property on Wilsonville Road. MCF representatives met with town officials on or about September 25, 2006 to discuss this report. During the course of MCF's consultation with town officials, the Town indicated that it was interested in locating a facility on town-owned property on Rich Road. MCF proceeded to investigate the possibility of developing a facility on this latter property pursuant to the town's request. (Applicants 1, pp. 17-18)
17. MCF attended a town meeting on November 21, 2006 at which MCF presented a proposal to develop a telecommunications facility on the town property on Rich Road. Subsequent to this meeting, MCF and the Town of Thompson executed a lease for this property. (Applicants 1, p. 18)

18. On or about May 29, 2007, MCF submitted a supplemental technical report to the town. This report described the development of a telecommunications facility on the town-owned property on Rich Road. (Applicants 1, p. 18)
19. On May 31, 2007, the Thompson First Selectman, David Babbitt, wrote a letter to the Council in which he waived the 60-day municipal review period and expressed the town's support for the proposed facility. (Applicants 1, Exhibit P)
20. The Town of Thompson has indicated that it would like to reserve space on the proposed tower to accommodate its future telecommunications needs. (Applicants 2, A4)
21. MCF would provide space on the proposed tower for the Town of Thompson's public safety communications antennas for no charge. (Applicants 1, p. 9)
22. At the public hearing, the First Selectman expressed his support for the tower, citing its benefits for travelers on I-395 and its potential for improving coverage for the town's emergency services. (Tr. 1, p. 9)
23. At the public hearing, Kevin Kennedy, Director of Planning and Development for the Town of Thompson, expressed support for the tower because of his belief that it would be beneficial for the town's economic development. (Tr. 1, p. 11)

Public Need for Service

24. The United States Congress, through adoption of the Telecommunications Act of 1996, recognized the important public need for high quality telecommunication services throughout the United States. The purpose of this Act, which was a comprehensive overhaul of the Communications Act of 1934, was to "provide for a competitive, deregulatory national policy framework designed to accelerate rapidly private sector deployment of advanced telecommunications and information technologies to all Americans." (Applicants 1, p. 5)
25. The Telecommunications Act of 1996 prohibits local and state bodies from discriminating among providers of functionally equivalent services. (Council Administrative Notice, Telecommunications Act of 1996)
26. The Telecommunications Act of 1996 prohibits any state or local agency from regulating telecommunications towers on the basis of the environmental effects of radio frequency emissions to the extent that such towers and equipment comply with the Federal Communications Commission's (FCC) regulations concerning such emissions. This Act also blocks the Council from prohibiting or acting with the effect of prohibiting the provision of personal wireless service. (Council Administrative Notice, Telecommunications Act of 1996)

27. In an effort to ensure the benefits of wireless technologies to all Americans, Congress enacted the Wireless Communications and Public Safety Act of 1999 (the 911 Act). The purpose of this legislation was to promote public safety through the deployment of a seamless, nationwide emergency communications infrastructure that includes wireless communications services. As an outgrowth of this act, the FCC mandated wireless to provide enhanced 911 services (E911) that would enable public safety dispatchers to identify a wireless caller's geographical location within several hundred feet. (Applicants 1, pp. 6-7)
28. The proposed facility would be in integral component of T-Mobile's wireless network in this area of Connecticut. (Applicants 1, p. 5)
29. The proposed facility would be an integral component of T-Mobile's E911 network. (Optasite 1, p. 7)
30. Cellco's antennas at this facility would comply with the requirements of the E911 act. (Tr. 1, p. 61)

Site Selection

31. MCF began looking for a site in this area in 2003. It was aware of a need for a facility in this area because it had built a tower in Webster, Massachusetts and knew that the Webster tower could not connect with the nearest tower to the south on Lowell Davis Drive in Thompson. (Tr. 1, p. 19)
32. In May of 2005, MCF was assigned a search ring in this area by T-Mobile. (Applicants 2, A2)
33. MCF identified five existing towers within four miles of its site search area. All of the towers are located outside of T-Mobile's search ring and would not adequately provide coverage to T-Mobile's target area. The towers are listed in the following table.

Tower Location	Tower Owner	Height of tower
Route 16 Webster, MA	Charter Communications	66'
Lowell Davis Road Thompson, CT	Charter Communications	78'
Off Douglas Road Webster, MA	Industrial Communications & Electronics, Inc.	213'
310 Thompson Road Webster, MA	SBA Towers, Inc.	59'
61 Lowell Davis Road Thompson, CT	Tele-Media	250'

(Applicants 1, p. 8; Exhibit G)

34. MCF focused its site search on the vicinity of Exit 100 of Interstate highway I-395. One landowner, Joan McHugh, owns three large tracts of undeveloped land in this area. MCF made several attempts to contact Ms. McHugh, but she did not respond to any of these attempts. (Applicants 1, Exhibit H)

35. At the McHugh property, T-Mobile would need a minimum height of 137 feet above ground level (AGL) to achieve its coverage objectives in this area. (Tr. 1, p. 25)
36. MCF investigated at least eight other parcels without being able to successfully execute a lease agreement on any of them. The parcels that MCF investigated had the following Assessor's designations:
- Map 97 – Block 28 – Lot 9
 - Map 97 – Block 29 – Lot 27
 - Map 97 – Block 29 – Lot 4
 - Map 116 – Block 29 – Lot 14
 - Map 116 – Block 29 – Lot 5
 - Map 116 – Block 24 – Lot 5
 - Map 116 – Block 29 – Lot 6
 - Map 116 – Block 29 – Lot 7

(Applicants 1, Exhibit H)

37. Repeaters, microcell transmitters, distributed antenna systems and other types of transmitting technologies are not a practicable or feasible means to provide service within the sizeable coverage gap T-Mobile is seeking to cover from the proposed location. (Applicants 1, pp. 7-8)
38. Cellco had its own search ring in this area of Thompson and was investigating another property at 354 Wilsonville Road as a potential location for a telecommunications facility. (Tr. 1, pp. 65-67)
39. The Town of Thompson did not support Cellco's efforts to build a telecommunications facility at 354 Wilsonville Road and preferred that Cellco locate on the Rich Road property that MCF was proposing. (Letter from Thompson First Selectman dated June 20, 2007)

Site Description

40. The proposed site is on an 8.0 acre vacant parcel located on Rich Road approximately 1500 feet northeast of Exit 100 of Interstate Highway I-395. The parcel is owned by the Town of Thompson. (Applicants 1, Exhibit A)
41. The site property is zoned R-40 Residential. The proposed tower would comply with Thompson's zoning regulations that pertain to wireless communications towers. (Applicants 1, pp. 15-16)
42. At this location, MCF would construct a 150-foot steel monopole tower within a fenced 50-foot by 90-foot equipment compound. The compound would be within a 100-foot by 100-foot lease area and would be enclosed by an eight-foot chain link fence. (Applicants 1, p. 9; Exhibit A)
43. The tower would be located at 42° 00' 41.4" latitude and 71° 51' 07.3" longitude. Its elevation at ground level would be 626 feet above mean sea level. (Applicants 1, Exhibits A and Q)

44. The tower would be designed in accordance with the specifications of the Electronic Industries Association Standard ANSI/EIA/TIA-222-G, "Structural Standards for Steel Antenna Towers and Antenna Support Structures," in accordance with the International Building Code. (Applicants 2, A5)
45. The tower would be designed to accommodate four antenna placements with additional capacity to accommodate antennas for the Town of Thompson. (Applicants 1, Exhibit A; Tr. 1, p. 21)
46. T-Mobile would initially install six antennas on a triangular platform with a centerline height of 147 feet AGL. It could eventually install a total of nine antennas. (Tr. 1, p. 20; Applicants 1, p. 9; Exhibit A)
47. T-Mobile could use T-arm mounts for its antennas. (Tr.1, p. 49)
48. T-Mobile's ground equipment would consist of cabinets on a concrete pad. (Applicants 2, A12)
49. T-Mobile would use batteries for back-up power. (Applicants 2, A13)
50. Cellco would install 12 antennas (six cellular and six PCS) on a low profile platform or on T-arms at a centerline height of 137 AGL. (Cellco 1, Response 11)
51. Cellco's back-up power would be provided by a series of wet-cell batteries and a diesel generator. (Cellco 1, Response 13)
52. Cellco's diesel generator would have a 275-gallon fuel tank. The tank would be double-walled and include a leak detection system. The concrete floor beneath the tank would be capable of containing 120% of all fluids used in the event of a failure of the generator unit. (Cellco 1, Response 14)
53. The proposed site is relatively flat and requires minimal grading. Approximately 123 cubic yards of cutting would be required to remove topsoil for the installation of the gravel road and gravel compound surface. No fill would be required. (Applicants 2, A7)
54. Vehicular access to the facility would extend from Rich Road via a new 132-foot gravel driveway. (Applicants 1, p. 9)
55. Utility connections would extend underground from an existing utility pole on Rich Road along the edge of the gravel access drive. (Applicants 1, p. 9; Exhibit A)
56. Exposed ledge is visible on the property where the facility would be located and may be encountered during excavation. If ledge is encountered, chipping would be preferred to blasting. (Applicants 2, A8)
57. The proposed tower's setback radius would be contained within the town property. (Applicants 1, Exhibit A, Drawing A02)
58. There are 21 residences within 1,000 feet of the proposed facility. (Tr. 1, p. 22)

59. The nearest residence to the proposed tower is located 243 feet to the northeast and is owned by Wladyslawa and Eugeniosz Wojtarowicz. (Applicants 2, A6)
60. The land use of the area around the proposed site is low density residential. (Applicants 1, p. 16; Tr. 1, p. 21)
61. The estimated construction cost of the proposed facility, not including antennas, adjustments or contingencies, is:

Tower and foundation (including installation)	\$ 244,811
Site development	233,927
Utility installation	59,546
Total	\$ 538,284

(Applicants 1, p. 19)

Environmental Considerations

62. The proposed facility would have no effect upon Connecticut's archaeological heritage. (Applicants 1, Exhibit M – July 5, 2007 Letter from State Historic Preservation Office)
63. The Narragansett Indian Tribal Historic Preservation Office found no evidence of cultural resources of significance to the Narragansett Tribe at the site of the proposed facility. (Letter from Narragansett Indian Tribal Historic Preservation Office, dated September 29, 2007)
64. The proposed facility would have no significant environmental impact on any of the environmental or cultural resources identified under Section 1.1307 of the National Environmental Policy Act. Applicants 1, Exhibit O)
65. There are no known extant populations of Federal or State Endangered, Threatened or Special Concern Species that occur at the site of the proposed facility. (Applicants 1, Exhibit M – May 18, 2007 Letter from Connecticut DEP)
66. Twenty-two trees with a diameter at breast height of six inches or more would be taken down to develop the proposed facility. (Tr. 1, pp. 21-22)
67. The nearest wetland is approximately 194 feet west of the proposed facility. (Applicants 1, Exhibit L, p. 2)
68. MCF would establish and maintain soil erosion control measures consistent with the Connecticut Guidelines for Soil Erosion and Sediment Control throughout the construction of the proposed facility. (Applicants 1, p. 17)

69. The proposed facility would not require registration with the Federal Aviation Administration nor would the tower require lighting or marking. (Applicants 1, pp. 18-19)
70. The maximum power density from the radio frequency emissions of T-Mobile's and Cellco's proposed antennas would be approximately 10.5% of the standard for Maximum Permissible Exposure, as adopted by the FCC, at the base of the proposed tower. This calculation was based on a methodology prescribed by the FCC Office of Engineering and Technology Bulletin No. 65E, Edition 97-01 (August 1997) that assumes all antennas would be pointed at the base of the tower and all channels would be operating simultaneously. (Applicants 1, Exhibit N; Cellco 1,)

Visibility

71. The proposed tower would be visible year-round from approximately 392 acres within a two-mile radius of the site. (Applicants 1, Exhibit K)
72. Year-round visibility of the proposed tower from roads within a two-mile radius of the site is presented in the table below:

Road	Length of Year-Round Visibility	No. of Residences with View
I-395	6,300 feet	n/a
Thompson Road	4,500 feet	28
Highland Road	150 feet	2
Porter Plain Road	800 feet	7
Emil Drive	1,200 feet	14
Liberty Lane	300 feet	5
Jezierski Lane	1,500 feet	17
Bates Point Road	800 feet	23

(Applicants 1, Exhibit K)

73. The proposed tower would be seasonally visible from an additional 32 acres. (Applicants 1, Exhibit K)
74. Seasonal visibility of the proposed tower from roads within a two-mile radius of the site is presented in the table below:

Road	Length of Seasonal Visibility	No. of Residences with View
Wilsonville Road	1,800 feet	3
Rich Road	1,800 feet	6
Juliette Avenue	1,200 feet	10

(Applicants 1, Exhibit K)

75. The visibility of the proposed tower from different vantage points in the surrounding vicinity is summarized in the following table. The locations of the vantage points listed are identified by their corresponding number in the Visual Resource Evaluation Report contained in Exhibit K of the application and Figure 10 of this document

<u>Location</u>	<u>Visible</u>	<u>Approx. Portion of (150') Tower Visible (ft.)</u>	<u>Approx. Distance and Direction to Tower</u>
	<u>Site</u>		<u>Site</u>
1 – 39 Rich Road	Yes	150'	250 feet; W
2 – 66 & 70 Rich Road	Yes	130'	750 feet; SW
3 – 88 & 90 Rich Road	No	n/a	1400 feet; SW
4 – 15 Rich Road	Yes	130'	650 feet; S
5 – 471 Wilsonville Road	Yes	120'	1600 feet; NW
6 – Wilsonville Road & Route 193	No	n/a	2100 feet; NW
7 – 1081 Route 193	Yes	30'	4400 feet; NW
8 – High Pointe Church on Route 193	No	n/a	2100 feet; W
9 – 54 & 56 Jezierski Lane	Yes	20'	4500 feet; SW
10 – Little Pond Boat Launch	Yes	20'	3700 feet; W
11 – 8 Liberty Lane	Yes	20'	3400 feet; NW
12 – 16 Emil Drive	Yes	40'	3800 feet; NW
13 – 82 & 83 Lakeside Avenue	No	n/a	10,000 feet ; SW
14 – 51 Colonial Avenue	No	n/a	8300 feet; SW
15 – Wilsonville Road & Lowell Davis Road	No	n/a	2800 feet; NE
16 – 354 Wilsonville Road	Yes	40'	1700 feet, NE
17 – Wilsonville Road	No	n/a	900 feet, N
18 – I-395, 0.5 mile north of exit 100	Yes	20'	4800 feet, NE
19 – Juliette Avenue	Yes	110'	950 feet, W

(Applicants 1, Exhibit K)

76. The visibility of the proposed tower and a tower at the McHugh property would be comparable. (Tr. 1, p. 25)
77. The proposed tower would not be visible from the Airline Trail, which is approximately 8,000 feet south of the proposed facility. (Transcript, October 11, 2007, 7:00 p.m. [Tr. 2], p. 15; Applicants 1, Exhibit K)

Existing and Proposed Wireless Coverage

T-Mobile

78. The operating frequencies T-Mobile would use at this facility are:

Transmit: 1935.000 to 1945.000 MHz
Receive: 1855.000 to 1865.000 MHz

and

Transmit: 1983.000 to 1984.000 MHz
Receive: 1903.000 to 1904.000 MHz

(Applicants 2, A11)

79. T-Mobile's minimum design receive signal level threshold is -84 dBm to provide in-vehicle coverage for its network users. Its lower limit for providing in-building coverage is -76 dBm for average residential and business dwelling environments. (Applicants 2, A15)

80. T-Mobile's existing signal strength in the vicinity of the proposed site ranges from -84 dBm to -105 dBm. (Applicants 2, A16)

81. T-Mobile's antennas would cover 6.984 square miles from the proposed site. (Applicants 2, A17)

82. T-Mobile has a coverage gap on I-395 in the vicinity of the proposed site of 1.72 miles. (Applicants 2, A18)

83. T-Mobile's antennas would cover 2.2 miles along I-395 from this site. (Applicants 2, A19)

84. T-Mobile's antennas at this site would hand off signals with the sites identified below:

Site Location	Type of Facility	T-Mobile Antenna Ht.	Distance and Direction to Site
310 Thompson Road Webster, MA	190' monopole	170 feet AGL	1.33 miles, N
720 Thompson Road Thompson, CT	140' monopole	140 feet AGL	2.34 miles, S

(Applicants 2, A20, A21)

85. The minimum height at which T-Mobile could achieve its coverage objectives from this site would be 147 feet AGL. (Applicants 2, A22)

86. At heights below 147 feet, T-Mobile's antennas would not be able to hand off signals to its existing on-air site to the north, and the signal strength would fall below the required -84 dBm. (Applicants 3, Pre-filed testimony of Scott Heffernan, A7)

Cellco

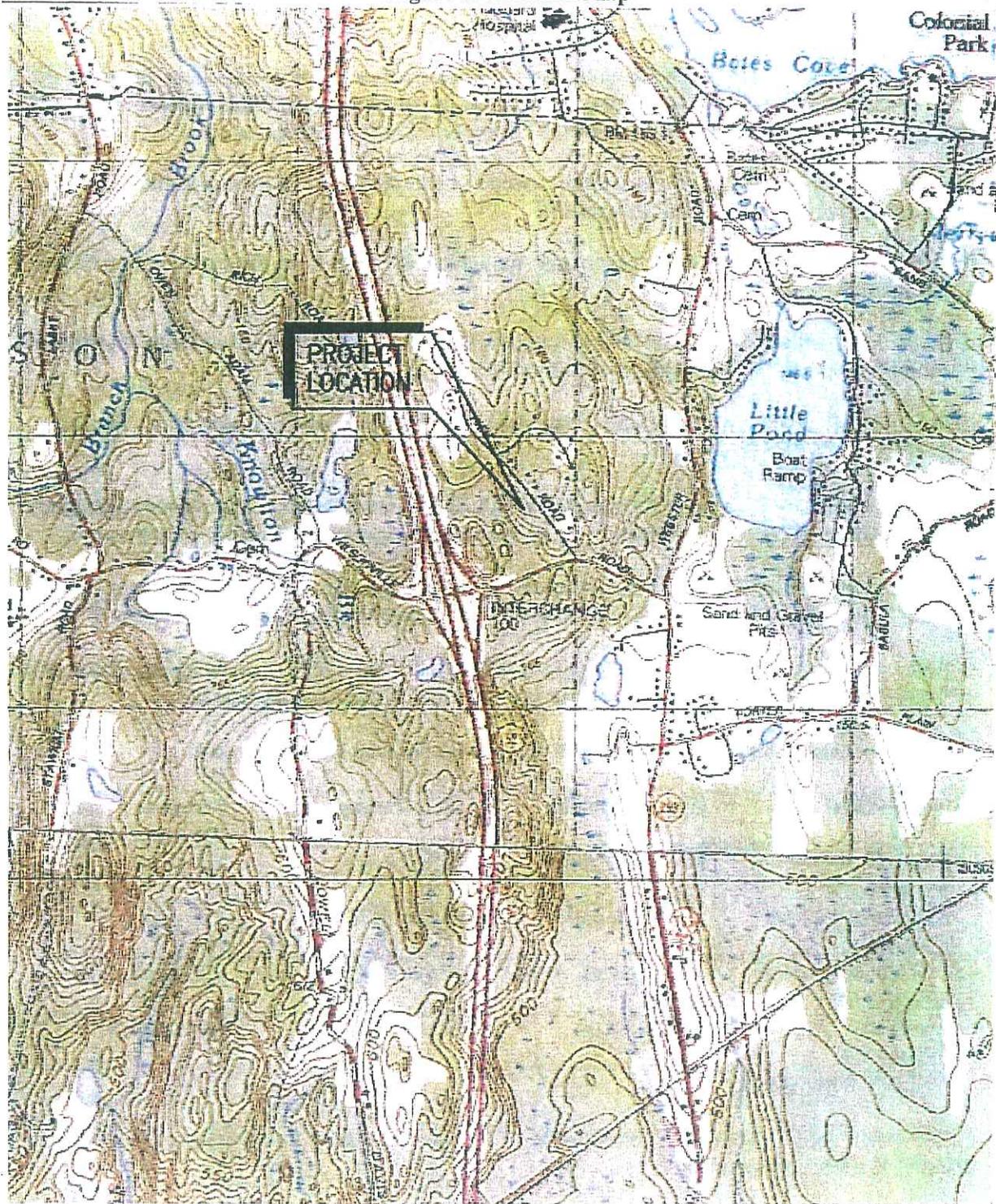
87. By locating on this facility, Cellco would seek to provide coverage primarily along Interstate 395 between Cellco's Webster 2 site in Massachusetts and its existing site in Thompson and along local roads in the northerly portions of the Town of Thompson. (Cellco 1, Response 5)
88. In Windham County, Cellco is licensed to operate in the 869-880 MHz cellular and 1970-1975 MHz frequency bands. (Cellco 1, Response 1)
89. Cellco designs its wireless system for a signal strength of -85 dBm for in-vehicle coverage. (Cellco 1, Response 3)
90. Cellco's design signal strength for in-building coverage is -75 dBm, but its coverage objective at this location is primarily to provide in-vehicle coverage. (Tr. 1, p. 61)
91. Cellco's signal strength in the vicinity of the proposed facility currently ranges from -86 dBm to -111 dBm. (Cellco 1, Response 4)
92. Cellco currently has a 1.2 mile coverage gap at cellular frequencies and a 2.3 mile coverage gap at PCS frequencies along I-395 between its Webster 2 and Thompson sites. (Cellco 1, Response 6)
93. From the proposed facility, Cellco's antennas would cover approximately 2.97 miles along I-395 at cellular frequencies and approximately 1.99 miles at PCS frequencies. (Cellco 1, Response 7)
94. Cellco's antennas would cover a total of approximately 9.8 square miles at cellular frequencies and 4.4 square miles at PCS frequencies from the proposed site. (Cellco 1, Response 8)
95. Cellco's antennas at this site would hand off signals with the sites identified below:

Site Location	Type of Facility	Cellco Antenna Ht.	Distance and Direction to Site
61 Lowell Davis Road Thompson, CT	243' lattice tower	237 feet AGL	2.2 miles, S
720 Quinebaug Road Thompson, CT	125' monopole	112 feet AGL	4.95 miles, W
84 Old Douglas Road Webster, MA	660' guyed lattice tower	130 feet AGL	3.36 miles, NW
Goya Drive Webster, MA	Lattice tower	175 feet AGL	4.54 miles, N

(Cellco 1, Response 9)

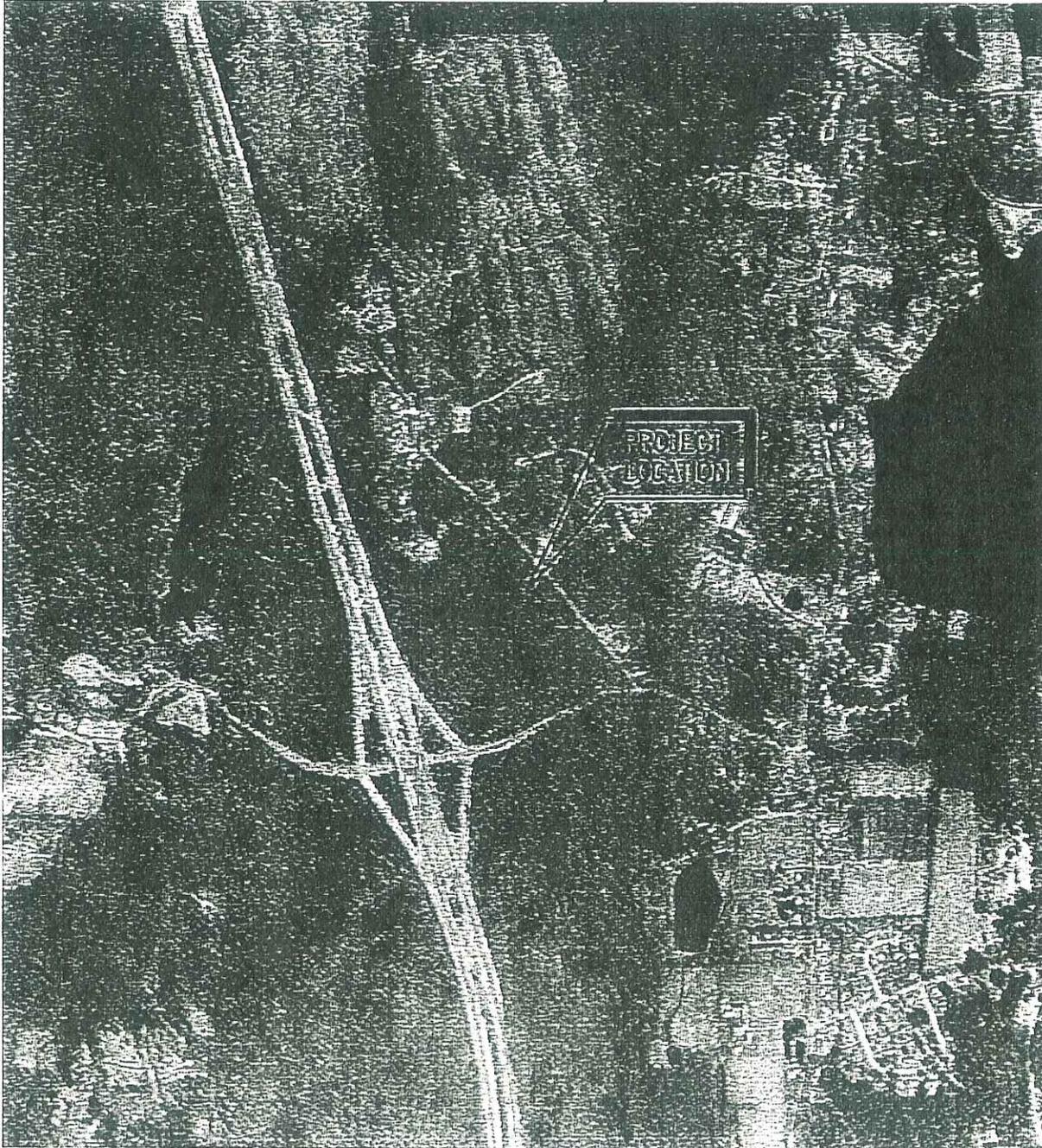
96. Cellco would need a minimum antenna height of 137 feet to achieve its coverage objectives from this site. (Cellco 1, Response 12)
97. Cellco's PCS coverage from this site would have some gaps to the north. Cellco is currently searching for a site in Massachusetts to fill these gaps. (Tr. 1, p. 62)

Figure 1: Location Map



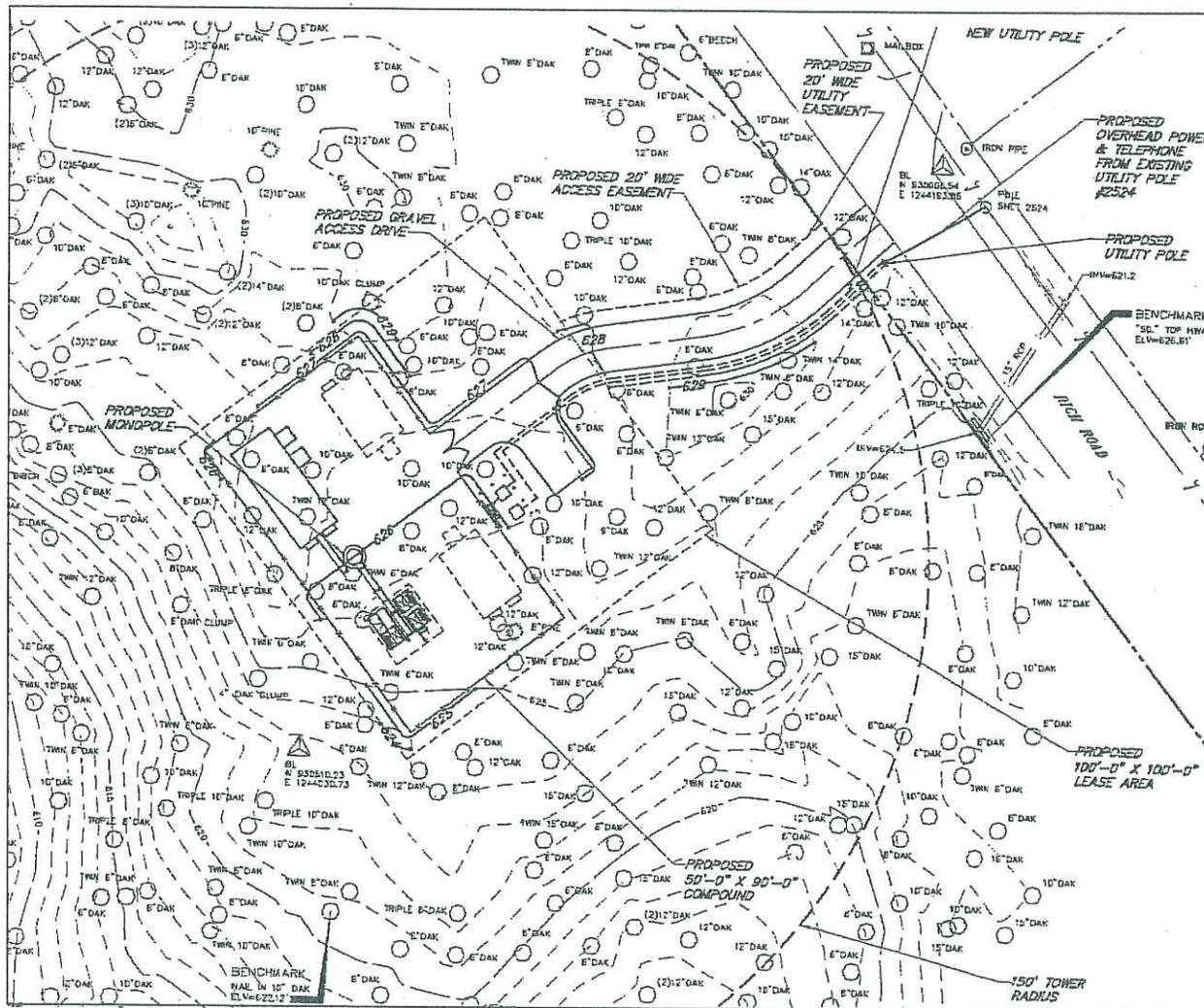
(Applicants 1, Exhibit A)

Figure 2: Aerial Photo of Proposed Location



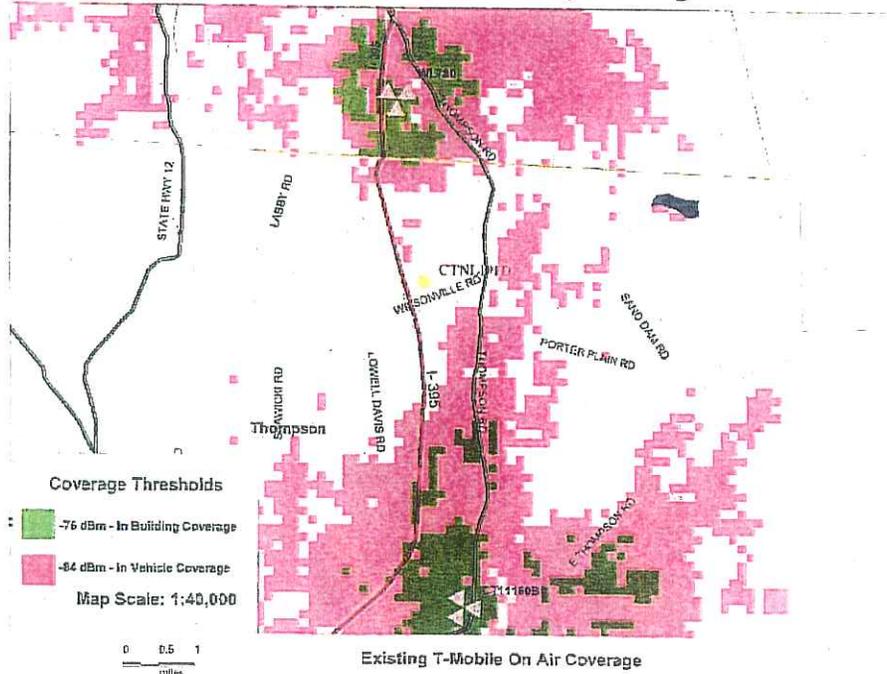
(Applicants 1, Exhibit A)

Figure 3: Proposed Site Plan



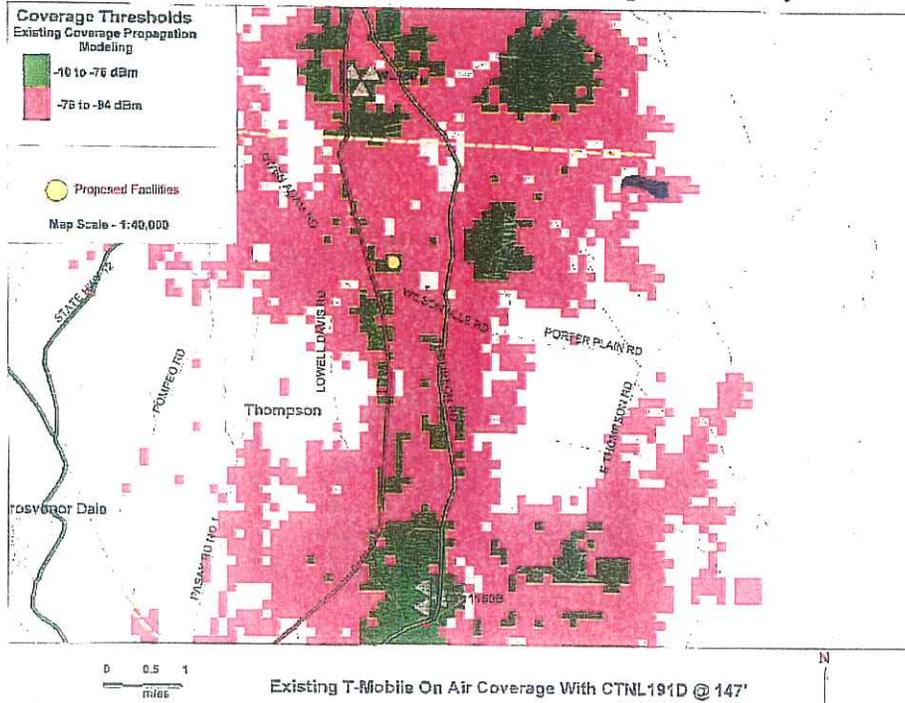
(Applicants 1, Exhibit 1)

Figure 4: T-Mobile's Existing Coverage



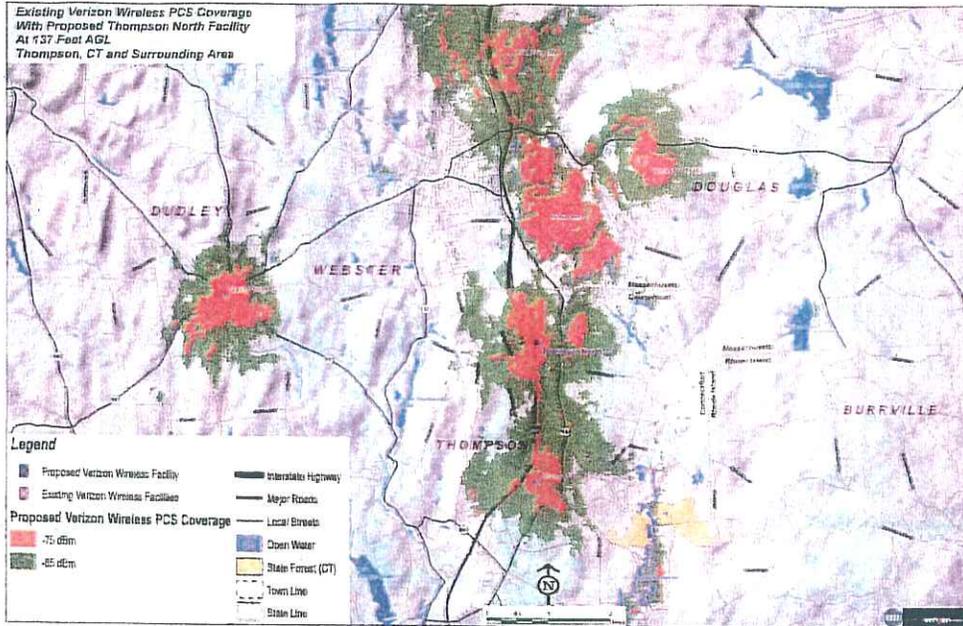
(Applicants 1, Exhibit F)

Figure 5: T-Mobile's Coverage with Proposed Facility



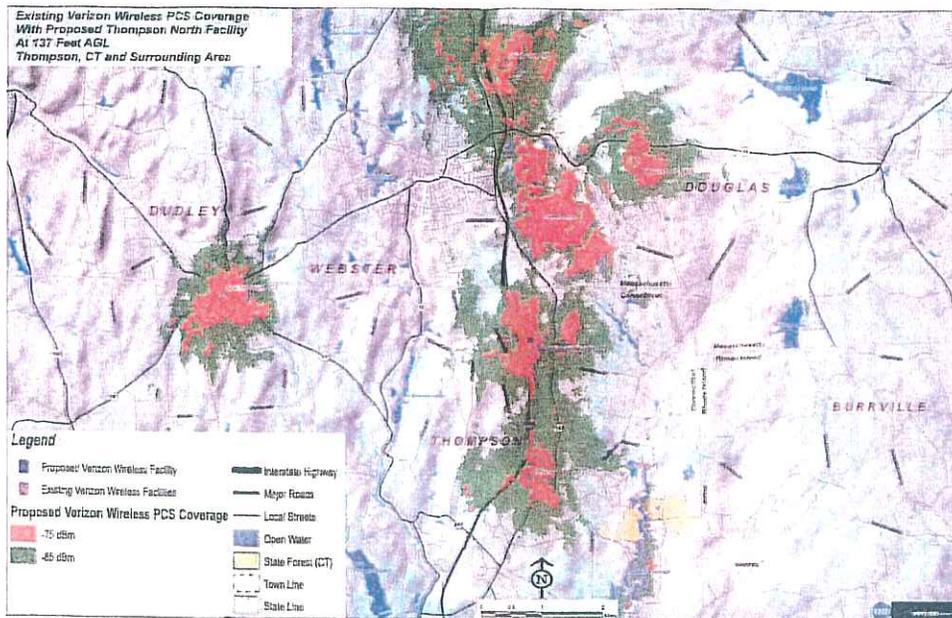
(Applicants 1, Exhibit F)

Figure 6: Cellco's Existing Cellular Coverage



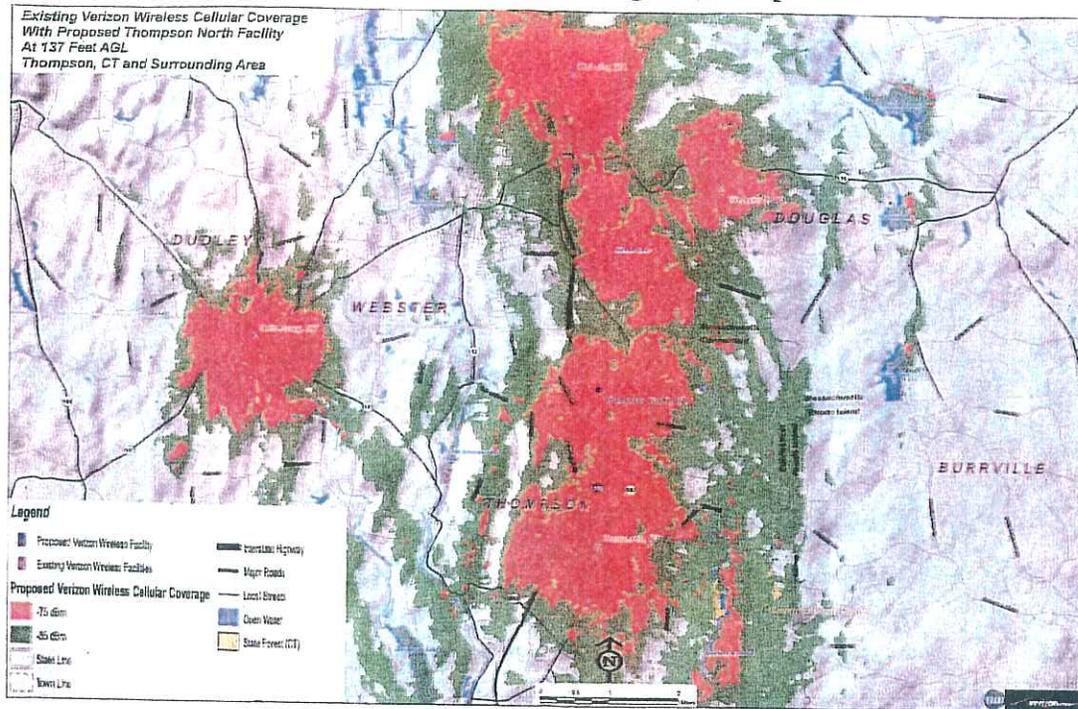
(Cellco 1, Attachment 1)

Figure 7: Cellco's Existing PCS Coverage



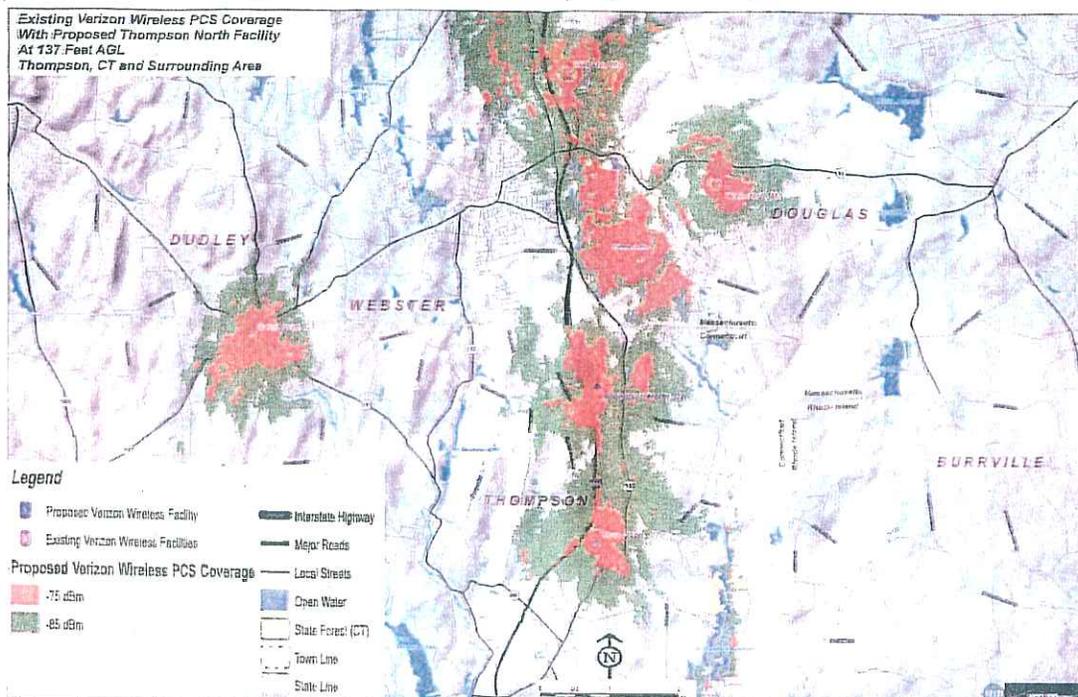
(Cellco 1, Attachment 1)

Figure 8: Cellco's Cellular Coverage with Proposed Site



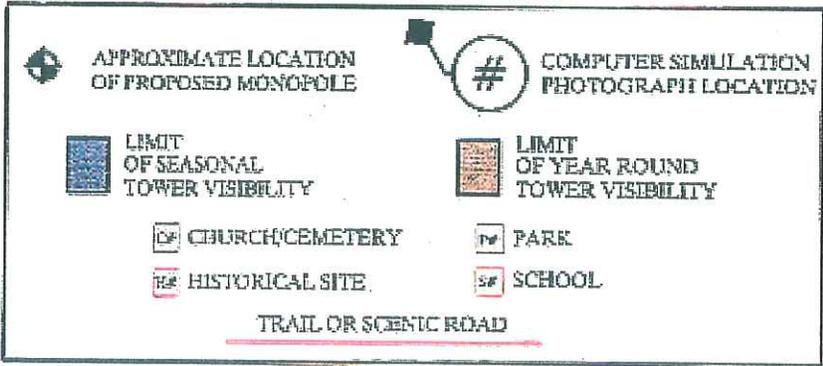
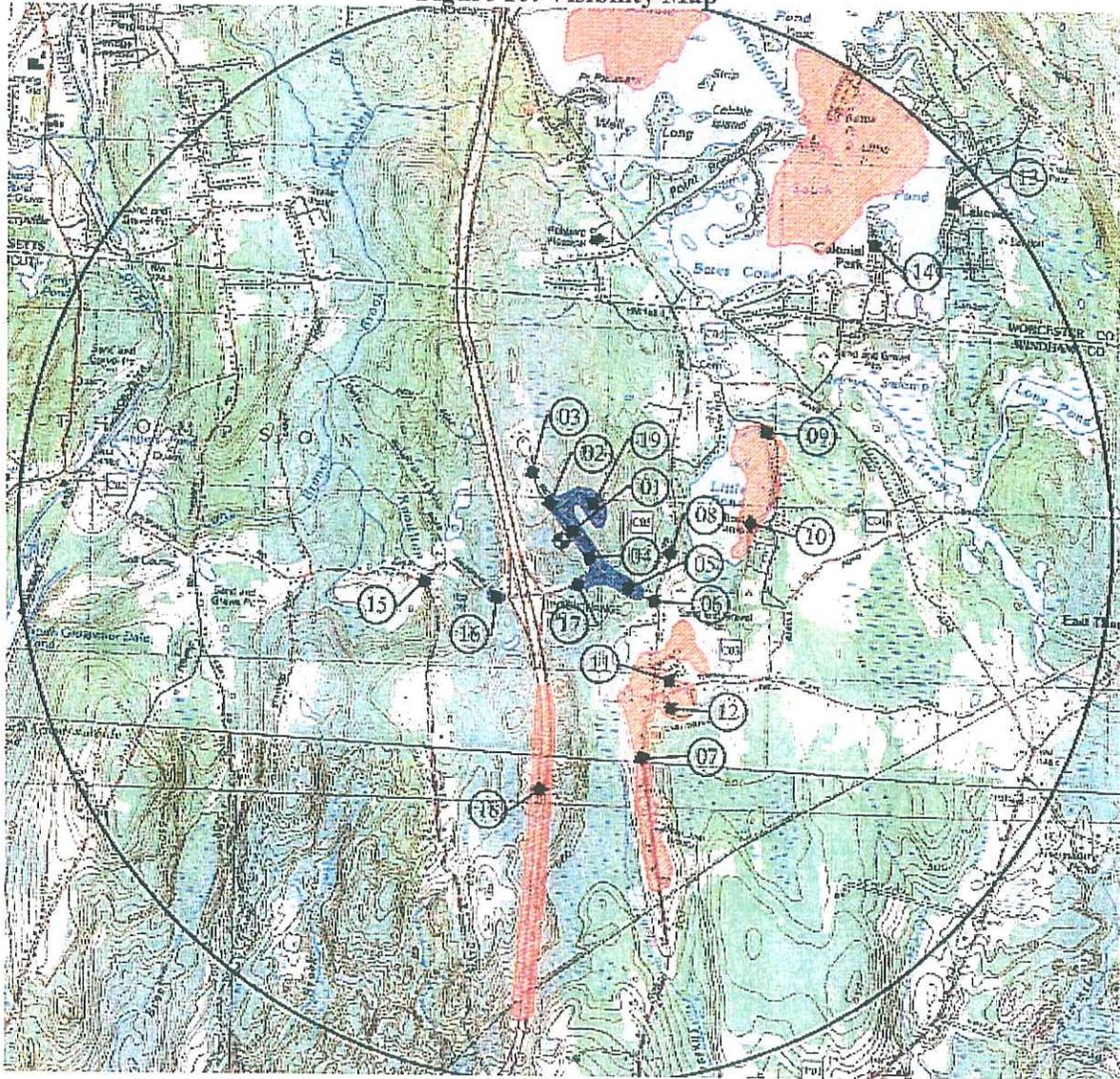
(Cellco 1, Attachment 1)

Figure 9: Cellco's PCS Coverage with Proposed Site



(Cellco 1, Attachment 1)

Figure 10: Visibility Map



(Applicants 1, Exhibit K)