

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

In Re: Application of New Cingular Wireless : Docket No. 373  
PCS, LLC (AT&T) for a Certificate of Environmental:  
Compatibility and Public Need for the Construction :  
Maintenance and Operation of a Telecommunications:  
Tower Facility at St. Matthew Lutheran Church at :  
224 Lovely Street in the Town of Avon : March 16, 2009

PRE-HEARING INTERROGATORIES  
DIRECTED TO APPLICANT AT&T BY TOWN OF AVON

The Town of Avon ("Avon") hereby requests that the applicant New Cingular Wireless PCS, LLC's ("AT&T") respond to the following Pre-Hearing Interrogatories.

COVERAGE NEEDS

1. What is AT&T's minimum acceptable signal strength level for in-building coverage and in-vehicle coverage, respectively?
2. What is the minimum tower height at the proposed Site required to meet AT&T's minimum acceptable signal strength for in-building and in-vehicle coverage, respectively?
3. What is the minimum tower height required to permit co-location at the proposed Site of one and two additional carriers, respectively?

4. Would operation in one frequency band or another, e.g., 850 MHz vs. 1900 MHz, have any impact on the height of the proposed facility? Please explain how, if at all, the proposed facility height would be affected.
5. Referring to AT&T's Exhibit G prepared in response to Council's Pre-Hearing Interrogatory #12 (First Set), explain whether there is a significant difference in coverage provided by the facility as proposed at 100' and at the proposed site at tower heights of 87' and 77'.
6. Does a proposed tower height of 77', as depicted in the above-referenced Exhibit G meet AT&T's minimum acceptable signal strength for in-building and in-vehicle coverage, respectively?
7. How many carriers, if any, could co-locate at the proposed facility if said facility was no greater than 80 feet in height?

#### ALTERNATIVE OFF-SITE LOCATIONS

8. Did AT&T consider locating the proposed facility in the Pond Ledge area of Avon, specifically including property owned by Avon Water Company? Refer to Attachment A for reference. Would this location meet AT&T's coverage needs? If answering in the negative, please provide an explanation as to why not.
9. Did AT&T consider Huckleberry Hill in Avon? Refer to Attachment A for reference. Would this location meet AT&T's coverage needs? If answering in the negative, please provide an explanation as to why not.

10. With respect to sites AT&T identifies in its Site Search Summary, Exhibit 2 to the Application, explain what radiofrequency engineering criteria the Juniper Drive and the Governor's Horse Guard sites did not meet.

#### CO-LOCATION AVAILABILITY

11. Of the existing sites AT&T identified in Avon, Burlington, Canton, Farmington and Simsbury in Exhibit 1 of the Application, were there any sites within a four mile radius of the site search area with co-location potential? If answering in the affirmative, list these sites and explain why co-location was not pursued by AT&T.

#### ALTERNATIVE DESIGNS & VISUAL IMPACTS

12. What are AT&T's mitigation measures for the facility as proposed?
13. If the landlord of the proposed Site were to give permission, is it technologically feasible for AT&T to build a second steeple for telecommunications use, including any of the following options:
  - a. removing the existing steeple and replacing it with a new steeple in the center of the building,
  - b. keeping the existing steeple and installing a new steeple for telecommunications use on the opposite gable in the front of the building,
  - c. keeping the existing steeple and installing a new steeple for telecommunications use in the rear at the SE corner of the building, or

- d. keeping the existing steeple and building a freestanding steeple type structure for telecommunications use to the rear of building?
14. Has AT&T consulted an architect regarding a steeple design?
15. Is a flagpole design feasible at the proposed Site? Specifically, could AT&T install a monopole designed as a flagpole similar to the tower facility located at Simsbury Commons Mall, a tower on which AT&T has co-located? See Attachment B, photographs depicting flagpole designed facility at Simsbury Commons Mall.
16. If a flagpole design were utilized, as depicted in Attachment B, what is the narrowest flagpole diameter possible to support a flagpole at the proposed height of 100' and at 80,' respectively?
17. Would utilization of a flagpole designed tower facility enable AT&T to reduce the size of the proposed compound to a size similar to the facility at Simsbury Commons Mall (21' x 45' or 945 sq. ft.).
18. The currently proposed monopole is 42 inches in diameter at the base, tapering to 26 inches at the top, are these diameters the narrowest possible to support the proposed 100' height? If answering in the negative, what are the narrowest respective diameters for the proposed height and what are the narrowest diameters for a monopole restricted to 80' in height?
19. State the reasons AT&T requires over 2400 sq. ft. (49' x 49') for the proposed compound?

20. What are AT&T's landscaping and screening plans for the proposed facility?  
Please provide the landscaping plan, if any. Has AT&T consulted a landscape architect or other appropriate professional to determine where screening is needed? Is AT&T willing to provide off-site screening?
21. Does AT&T intend to operate fuel-powered electric generators at the Site?

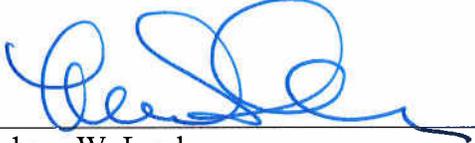
#### TECHNOLOGICAL ALTERNATIVES

22. Provide a detailed list of the technological alternatives AT&T considered as an alternative to the proposed Facility and provide an explanation as to why each were rejected.
23. Did AT&T prepare coverage maps simulating potential coverage of each of the technological alternatives considered by AT&T? Please provide any coverage maps. If no maps were prepared, please explain why AT&T did not prepare such maps as part of this process?

#### FUTURE MODIFICATIONS

24. Does the design of the proposed monopole permit AT&T to increase the height of the structure in the future?
25. Does AT&T anticipate that the height of the facility, as proposed, will need to be increased in the future to meet its coverage needs?
26. Would a flagpole design, as described in Interrogatory # 15, limit AT&T's ability to increase the height of the structure in the future?

THE TOWN OF AVON

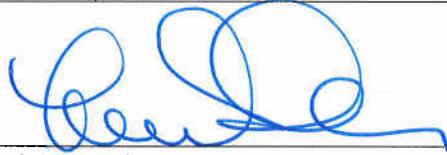
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CERTIFICATE OF SERVICE

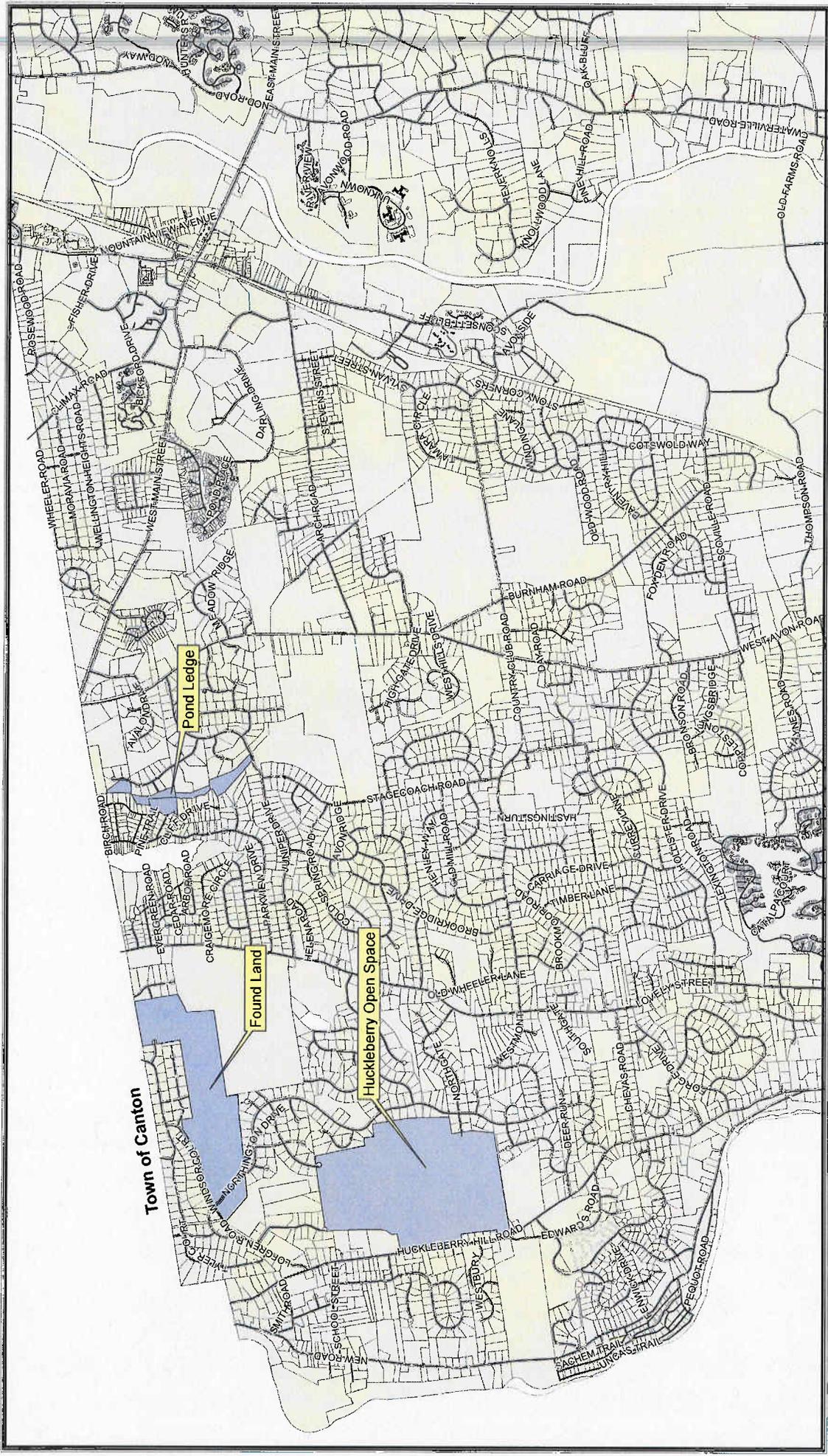
This is to certify that a copy of the foregoing has been mailed, postage prepaid, on this  
16<sup>th</sup> day of March, 2009 to:

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Loni S. Gardner

# ATTACHMENT A



**Map Showing  
Huckleberry Open Space  
Foundland  
Pond Ledge**

**Town of Avon  
Planning Department**

March 13, 2009



Map Not To Scale

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# ATTACHMENT B



