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September 14, 2010

VIA FEDERAL EXPRESS
and ELECTRONIC MAIL

Ms. Linda L. Roberts
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

***Re: Docket No. 392 – Application of T-Mobile Northeast LLC,
For a Certificate of Environmental Compatibility and Public
Need for the Construction, Maintenance and Operation of a
Telecommunications Facility at 387 Shore Road in
the Town of Old Lyme, Connecticut***

Dear Ms. Roberts:

I write on behalf of the Applicant, T-Mobile Northeast LLC ("T-Mobile"), regarding the draft findings of fact issued by the Connecticut Siting Council ("Council") for the proposed telecommunications facility at 387 Shore Road, Old Lyme, Connecticut. T-Mobile respectfully submits the following proposed change to the findings of fact. Underlined portions include modified text.

Draft Finding of Fact 4. T-Mobile proposes the following modification: T-Mobile's proposed facility would provide coverage to Route 156, Connecticut Road, Oak Ridge Drive, Hatchetts Point Road, just south of Interstate 95, as well as the surrounding areas and the Amtrak rail line that passes through the area.

Draft Finding of Fact 18. This finding addresses the Town's knowledge of the 170 foot telecommunications facility proposed by SBA Towers II LLC ("SBA") at 14 Cross Lane ("SBA Facility"). The Town's knowledge regarding the SBA Facility changed during the proceedings. As such, T-Mobile requests that the Town's beliefs be referenced in the past tense.

Proposed Finding of Fact. T-Mobile respectfully requests that the Council include the following finding of fact after finding 41:

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A two tower scenario would not alleviate T-Mobile's existing coverage gap in the Town. Under such a scenario, gaps would exist in T-Mobile's network, which would result in network performance problems. Additionally, a two tower scenario would require taller facilities – much taller than those proposed by T-Mobile in this Docket as well as Dockets 391 and 393. T-Mobile requires a three tower scenario to provide effective wireless service to the areas of the Town covered by the Facility and those telecommunications facilities proposed in Dockets 391 and 392. (3.2.10 Tr., p. 113; 4.20.10 Tr., pp. 68-69, 71-74, 111.)

Proposed Finding of Fact. T-Mobile respectfully requests that the Council include the following finding of fact after finding 41:

The difficulties inherent in a two tower solution to the coverage gaps in the Town are compounded by the coverage needs of Verizon and AT&T. Both wireless providers have established that coverage gaps exist in their respective networks in the area of the Town that would be covered by the telecommunications facility proposed in Docket 391. AT&T could not use the Facility or the telecommunications facility proposed in Docket 392 to alleviate its existing coverage gap. Although Verizon could use the Facility, Verizon could not alleviate its coverage gap with the facility proposed in Docket 393. (Docket 391 Verizon pre-hearing filing, April 26, 2010; Docket 391 AT&T filing, June 28, 2010; 4.20.10 Tr., p. 168-70; 6.23.10 Tr., pp. 20, 31-32.)

Draft Finding of Fact 50. T-Mobile proposes the following modification: An outdoor Distributed Antenna System (DAS) would not be a feasible alternative to a tower because of the following reasons:

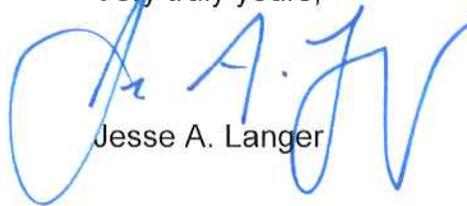
- a) The unavailability of a sufficient number of existing utility poles on which to string fiber-optic cable and install DAS nodes in the coverage area;
- b) The existing utility poles are generally low in height;
- c) The existing uneven terrain and mature vegetation would prevent DAS nodes from providing reliable coverage throughout the target area;
- d) The unavailability of unused fiber-optic cables to serve as the backbone for the DAS network in the area; and

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- e) There would be a need to enter into access easements, enter pole attachment agreements, etc., which would be compounded by the large amount (roughly 45) of DAS nodes required to cover the total area to be served by the three tower proposed in Docket Nos. 391, 392 and 393.

Please let me know if you have any questions.

Very truly yours,



Jesse A. Langer

JAL:dlm

cc: Service List (*Via First Class U.S. Mail*)