

STATE OF CONNECTICUT
SITING COUNCIL

Homeland Towers and
New Cingular Wireless PCS, LLC : DOCKET # 445
Application for a Certificate of Environmental
Compatibility and Public Need for the construction,
Maintenance, and operation of a telecommunications
Facility located at
Old Stagecoach Road, Ridgefield, Connecticut.

: APRIL 2, 2014

INTERROGATORIES TO APPLICANT

The following Interrogatories are directed to the Applicant (both AT&T and Homeland Towers as appropriate) by the Intervenor.

1. What propagation model does the applicant employ to determine calculated coverage?
2. What is the frequency band that is depicted in the coverage plots submitted with the Application?
3. What clutter model and what terrain data base were utilized in these calculations?
4. What effective radiated power and antenna type along with beam tilt, if applicable, were utilized in these calculations?
5. Were drive tests ("scan tests") that would verify the results of the calculated plots conducted? If so, please provide the data sets which were generated by the tests and note whether the data needs to be corrected for variables including, but not limited to, antenna position, gain and line loss.
6. Has the applicant performed continuous wave ("CW") tests from the proposed site or any other site either identified or considered?
7. In calculating the expected coverage from the proposed site, what antenna centerlines, antenna types and effective radiated power did the applicant assume would be put in use?

8. Has the applicant performed a minimum height analysis to determine the minimum antenna centerline that it requires to meet its alleged coverage needs?
9. By what method was it determined that identified alternate sites did not meet the needs of the Applicant? If studies were conducted to confirm the utility of the alternate sites, please provide copies of those studies?
10. What antenna centerlines, antenna types and effective radiated power did the applicant assume to determine expected coverage from alternate sites indicated?
11. Is there another combination of alternate sites that could be utilized to achieve the alleged coverage needs?
12. What alternate means of achieving the alleged coverage needs have been explored?
13. Does the applicant possess any data that support either dropped calls, customer complaints or other switch based or customer service representative based information that supports its claim of lack of service in the entire area that it claims it has a coverage issue?
14. Are there other sites in the community that is the subject of these proceedings at which the Applicant is considering developing wireless communications facilities?
Please describe.
15. Please name all carriers with whom you have reason to believe will co-locate on the proposed facility.
16. Please identify the size of the search ring and explain why that radius was chosen.
17. What is the percent of dropped calls in the target area?
18. How many residential wireless customers will this facility serve?
19. What surety does the Applicant propose to do to ensure the proper decommissioning of the facility once it is no longer needed or in use? And will the Applicant provide a bond to ensure decommissioning?
20. Please describe the methods used by your visual impact consultant to calculate

seasonal visibility.

21. What studies did you undertake to eliminate alternate technologies from consideration given that they are of lesser impact to surrounding property uses?

21. Who conducted the feasibility studies on alternate technologies?

22. Please provide the feasibility studies or data by which you determined the lack of feasibility?

23. Have you considered using a combination of two shorter towers just above treeline to cover the target area?

24. Is there a particular standard or decibel signal strength which you believe is necessary for adequate coverage for PCS (1900MHz) service in the target coverage area? For 850MHz service? For 700 MHz

25. What particular dBm signal strength do you believe is necessary for in-vehicle coverage for PCS (1900MHz), 700 MHz and 850MHz in the target area?

26. In the proposed coverage maps submitted by the Applicant, what loss margin was assumed in the modeling?

27. For any signal strength predicted by your coverage modeling, what percent-of-locations is assumed for reliability? (e.g: 85% of locations, 95%?)

28. Are you assuming that your target coverage is 'reliable service' or "adequate coverage"? Do these two terms differ? How do you define these two terms for the purposes of meeting the goals of the Telecommunications Act of 1996?

29. How many residences (as opposed to acres) will have year round views of the proposed towers? Seasonal views?

30. Your visual impact analysis indicates that a large portion of the visibility of the tower will occur over open space lands owned by the town conservation commission for recreational trails. Did you simulate any of the views from the recreational trails? or in any way determine the impact to the scenic views of tourists and residents using the open space for recreation?

31. What is the percentage of dropped calls and ineffective attempts, as compared to the remainder of the Market Trading Area for the Ridgefield area?
32. What is the lowest height you can construct a tower to improve coverage (with and without co-located carriers)?
33. Has the Applicant determined whether the area of the proposed facility is served by fiber optic cable?
34. Please identify how many other future sites will be necessary, at a minimum to accomplish adequate coverage for the target municipality.
35. Please identify any sites in addition to the Proposed Facility on which the Applicant intends to seek permission from the Siting Council to construct or modify a facility in the Ridgefield area (Ridgefield and adjacent towns)?
36. Will construction practices for the proposed facility conform to local building and zoning ordinances and regulations?
37. Can you provide coverage propagation maps and isolated propagation maps for the proposed facility on clear plastic overlays using a scale that matches that of the Application at 4 dBm intervals?
38. What is the minimum dBm signal strength to accomplish hand off of a call to an adjacent cell for 700Mhz, 850 MHz and 1900 Mhz?
39. What are the coordinates, antenna heights, antenna types, orientations, tilt, EIRP for all of the Applicant's wireless facilities in Ridgefield and adjacent towns?
40. In light of the likely presence of the federally endangered bog turtle, have you submitted a NEPA application describing impact and mitigation methods to protect the bog turtle? If so, please provide a copy of the same.
41. Has the Applicant (AT&T) or Homeland Towers constructed a wireless facility in Connecticut with less than 10 foot separation between antennas (bottom tip end to top tip end as opposed to centerline to centerline)? If so, how many?
42. Please identify the sites which form the basis for your response in the preceding

Interrogatory.

43. Has the Applicant (AT&T) or Homeland Towers constructed a wireless facility in states sharing a border with Connecticut with less than 10 foot separation between antennas (bottom tip end to top tip end as opposed to centerline to centerline)? If so, how many?

44. Please identify the sites which form the basis for your response in the preceding Interrogatory.

Respectfully Submitted,

Intervenor,

By _____
Keith R. Ainsworth, Esq.
Evans Feldman & Ainsworth, L.L.C. #101240
261 Bradley Street
P.O. Box 1694
New Haven, CT 06507-1694
(203)772-4900
(203)782-1356 fax
krainsworth@EFandA-law.com

CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 2nd day of April, 2014 and addressed to:

Ms. Melanie Bachman, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 (1 orig, 15 copies, plus 1 electronic) (US Mail/electronic).

New Cingular Wireless PCS, LLC c/o Daniel Laub, Esq, Cuddy & Feder, LLP, 445 Hamilton Avenue, 14th Floor
White Plains, NY 10601 (914) 761-1300 (914) 761-5372 fax
cfisher@cuddyfeder.com
dlaub@cuddyfeder.com

Michele Briggs
AT&T
500 Enterprise Drive
Rocky Hill, CT 06067-3900
michele.g.briggs@cingular.com (all by e-mail)

Ray Vergati
Homeland Towers, LLC
22 Shelter Rock Lane,
Bldg. C
Danbury, CT 06810
rv@homelandtowers.us

Keith R. Ainsworth, Esq.