

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
 :  
 : PETITION NO. 809  
 :  
 A PETITION OF EXTENET SYSTEMS, INC. :  
 FOR A DECLARATORY RULING ON THE :  
 NEED TO OBTAIN CONNECTICUT SITING :  
 COUNCIL APPROVAL TO DEVELOP A :  
 DISTRIBUTED ATENNA SYSTEMS IN :  
 LOWER FAIRFIELD COUNTY, :  
 CONNECTICUT : AUGUST 7, 2007

INTERROGATORY RESPONSES TO MERRITT PARKWAY CONSERVANCY  
FROM APPLICANT EXTENET

Applicant Extenet Systems, Inc. ("Extenet") submits the following responses to the interrogatories from the Merritt Parkway Conservancy in connection with the above-captioned petition:

- Q1. Does the coverage map reflect coverage by cell towers north and south of the Parkway, including the new tower to be installed on the property of the Round Hill Community Church, the proposed Nextel tower on Long Ridge Rd., and any other pending tower?**
- A1. ExteNet considered existing conditions data during the design process of the 27 node Merritt Parkway DAS network. Potential future tower sites or other network changes have not been taken into consideration. While the existence of any approved facilities will provide additional coverage for Wireless Service Providers ("WSPs") along the route, due to the terrain and the dense foliage, there will still be holes in coverage and poor performance areas along the Parkway that cannot be filled by a traditional macro facility and therefore those facilities would not eliminate the need for the DAS project. Such a facility may result in re-locating existing nodes or possibly removing one or two nodes. However, as explained in ExteNet's Interrogatory responses dated July 25, 2007, the proposed system will be utilized by other users other than the current WSPs who may not be capable of co-locating on an existing telecom facility. Therefore, the need for the system is unchanged by the approval of Docket 309 or any other proposed facility.

**Q2. What independent agency has verified the accuracy of the coverage map?**

A2. ExteNet regularly works with Envision Wireless, Inc. a mobile engineering firm for independent Radio Frequency testing and propagation verification. Envision has performed multiple RF benchmark and CW studies for ExteNet along this portion of the Merritt Parkway. See Pre-filed Testimony of Tormod Larsen at Exhibit 1.

**Q3. At what locations other than existing bridges does Extenet contemplate installing cable suspended over the Parkway or antennas alongside the Parkway? Please identify.**

A3. Other than the nodes proposed for extension over the bridge locations, ExteNet proposes the extension of new cable over the Merritt Parkway at Node 25, where there is an existing aerial crossing but not a bridge crossing. Nodes 2, 6, 11, 16, 21 are proposed for attachment on existing CL&P utility poles at or near a bridge underpass. Nodes 12, 20, 33 are proposed for attachment on existing CL&P poles off of the Merritt Parkway on adjacent local roads. Node 35 is a new pole placement near the Den Road exit.

**Q4. What is the experience of equipment durability, and possible deterioration due to exposure to New England weather conditions?**

A4. The antenna and node equipment being proposed for deployment along the Merritt Parkway corridor has been designed for extreme outdoor applications. Weather conditions such as those common in New England have been considered in the durability and design of the antenna and node equipment.

**Q5. What have you learned from your exploration of using poles off the Parkway to reduce the number of boxes over bridges?**

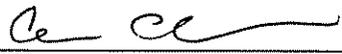
A5. ExteNet has evaluated using poles off the Merritt Parkway to provide a coverage solution. Unfortunately, the dense foliage along this corridor does not allow for RF propagation off-parkway to penetrate onto the Merritt Parkway and therefore will not provide the necessary E-911 coverage required along the Merritt Parkway proper. Due to the "tunnel effect" of the dense foliage along the Merritt Parkway, the only feasible way to provide a continuous coverage solution is to place these antenna facilities directly over the travel lanes in the middle of the Parkway. It is important to note that these "boxes" are passive antennas, not electronics.

**Q6. What is the result of your explanation of the possibility of installing equipment on existing Parkway signage?**

- A6. ExteNet would impose additional impact to the Merritt Parkway corridor if required to use the existing Parkway signage as attachment structure due to the need of extending power and fiber optic cable services over to each existing sign. This would include the placement of new utility pole structures (near off-ramp locations) for the extension of the necessary utility features. Additionally, the very low height (AMSL) of the existing signage on the Parkway would require additional node facilities to be placed in order to provide continuous coverage along the Merritt Parkway corridor. Lastly, ExteNet has not confirmed the availability of the signage for attachment from the Connecticut Department of Transportation.
- Q7. Confirm the obligation to maintain equipment and replace or remove as technology advances or in event license expires or continued use of the proposed system terminates for any reason.**
- A7. ExteNet is contractually obligated to provide a comprehensive wireless network solution per the Service Level Agreement established with the Wireless Service Providers. This includes all equipment maintenance, network monitoring, and facility upgrades. Additionally, ExteNet is required to place removal bonding for the equipment in the unlikely event of a network vacancy. This is required by the CL&P / SNET utility pole attachment agreement.
- Q8. Provide for rights of survivorship in case of Extenet merger and for bond or other security as protection against bankruptcy.**
- A8. ExteNet is required to comply with extensive surety & removal bond requirements as per the CL&P / SNET utility pole attachment agreements. Additional provisions are included in the Network License Agreements with the Wireless Service Providers that provide for survivorship in the unlikely event of an ExteNet merger or bankruptcy.
- Q9. Confirm that the Conservancy will choose the color of antenna boxes.**
- A9. ExteNet is willing to paint the antenna boxes and will paint the antenna boxes in accordance with the Council's decision and order in this petition.
- Q10. Confirm that the Landscape Master Plan of Parkway shall be followed and not altered in any way.**
- A10. ExteNet will comply with the Landscape Master Plan of the Parkway and will not alter it in any way.
- Q11. Include MPC in planning process if DAS is extended along Parkway or expanded to Wilbur Cross Highway.**

- A11. At this time, ExteNet does not plan for a network extension along the Parkway or an expansion to the Wilber Cross Highway. However, ExteNet will agree to notify and include the MPC of any such activities.

Respectfully Submitted,

By:  \_\_\_\_\_

Attorneys for the Applicant  
Julie D. Kohler, Esq.  
jkohler@cohenandwolf.com  
Carrie L. Larson, Esq.  
clarson@cohenandwolf.com  
Cohen and Wolf, P.C.  
1115 Broad Street  
Bridgeport, CT 06604  
Tel. (203) 368-0211  
Fax (203) 394-9901

**CERTIFICATE OF SERVICE**

I hereby certify that on the 7th day of August 2007, copies of the foregoing interrogatories were served via electronic mail to the following to:

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

Merritt Parkway Conservancy  
c/o Karen Salerno, Executive Director  
P.O. Box 17072  
Stamford, CT 06907

Diane W. Whitney  
Pullman & Comley, LLC.  
90 State House Square  
Hartford, CT 06103-3702

Ira W. Bloom, Esq.  
Wake, Dee, Dimes, Brynizcka, Day & Bloom  
27 Imperial Avenue  
P.O. Box 777  
Westport, CT 06881-0777

Christopher B. Fisher, Esq.  
Cuddy & Feder LLP  
445 Hamilton Avenue, 14<sup>th</sup> Floor  
White Plains, NY 10601-5196

Stephen J. Humes, Esq.  
McCarter & English, LLP.  
185 Asylum Street, CityPlace I  
Hartford, CT 06103

Thomas J. Regan  
Brown Rudnick Berlack Israels LLP  
City Place I, 185 Asylum Street  
Hartford, CT 06103-3402

  
Carrie L. Larson