



Industrial Communications & Electronics, Inc.
Industrial Tower and Wireless, LLC
Industrial Communications, LLC

40 Lone Street
Marshfield, Massachusetts 02050
781-319-1111 • Fax 781-837-4000

August 5, 2021

UPS Second Day Air to:

Northwest Regional Planning Commission
c/o Emily Klofft, Regional Planner
75 Fairfield Street
St Albans City, VT 05478

With Copy via UPS Second Day Air to:

Vermont Public Utility Commission
c/o Holly R. Anderson, Clerk of Commission
112 State Street
Montpelier, VT 05620-2701

RE: Industrial Tower and Wireless, LLC – Fairfax - #21-2243-AN
Proposed Wireless Telecommunications Facility
22 Toof Road, Fairfax, VT 10168

Dear Ms. Klofft,

Industrial Tower and Wireless, LLC ("ITW") is in receipt of your two letters to Attorney Brian Sullivan/ MSK Attorneys, who represents ITW with respect to the above-referenced proposal. We've addressed the concerns you stated on behalf of the Northwest Regional Planning Commission below, and we intend to address the same in our formal application to the Public Utility Commission.

1. **Industrial Communications** – ITW and affiliate companies, including Industrial Communications, LLC, Industrial Communications & Electronics, Inc., and Industrial Wireless Technologies, Inc. (together "Industrial") have been servicing all aspects of the communications industry for over forty (45) years.
2. **FCC Licenses** – Industrial is licensed to provide its own Commercial Mobile Radio Services (CMRS) services throughout the State of Vermont. Industrial operates what is typically referred to as an Enhanced Specialized Mobile Radio (ESMR) System providing a variety of land mobile communications services in New England with a network of sites and equipment. We have enclosed copies of the relevant licenses.
3. **Cellular Coverage** – The proposed facility will also provide coverage along a gap in service for the major wireless carriers along Vermont Route 104. The Industrial proposed site will cover a different coverage gap area for the other major wireless carriers than the Verizon tower proposed at Fletcher Road which is over 2.5 miles away and obstructed by intervening terrain from our proposed tower (21-2224-AN). In addition to providing ESMR Service to its own broad base of customers throughout New England, Industrial constructs personal wireless facilities, including communications towers, transmitters, antenna structures, and other types of installations for other providers of CMRS. Industrial also constructs towers upon which it leases space to numerous CMRS providers as "co-location" sites. ITW has a great deal of experience and technical ability to coordinate and provide for the needs of multiple users at any given site.
4. **Co-location on Verizon Proposed Tower** – The Fletcher Road tower would not provide the needed service to the coverage area because of the reduced height of the proposed tower (130' monopole), the distance from our proposal (over 2.5 miles) and intervening terrain. Industrial in its formal application will be able to provide additional analysis that such co-location of these two projects is not feasible.

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5. **Aesthetics/ Landscaping** – The location of the proposed site was selected based on the coverage need while at the same time siting in an area less obtrusive and less ecologically sensitive. Industrial elected to propose a lattice tower, rather than a solid pole, because a lattice tower reduces any visual impact. The proposed tower will be constructed of galvanized steel, with a grey color that blends well with the typical color of the sky in New England. Furthermore, the proposed facility will be buffered by dense vegetation and existing trees, which provides camouflaging from abutting lots and most nearby locations. Industrial had a balloon test and visual impact analysis prepared which will be submitted with the formal application.
6. **Safety** – The tower itself will be installed on a concrete foundation and will meet all applicable federal, state and local codes. The entire 80 ft. by 80 ft. compound will be protected from any unauthorized entry by eight-foot-high chain link fencing. The compound will be secured by a pad lock on the fence surrounding it as well as a 14-foot-wide security gate with a pad lock. Although a “fall zone” is not specifically required, the proposed location is +/447 feet from the nearest property line thus allowing for a fall zone well in excess of the “fall zone” of the height of the tower (155’).

Should you have any questions regarding this matter or require any additional information, please contact me directly at (781) 319-1003 or at Shayna.Galinat@induscom.com.

A copy of this response has also been uploaded to the ePUC portal.

Sincerely,

Industrial Communications



Shayna L. Galinat, Esq.
General Counsel

Cc: Brian Sullivan, Esq. MSK Attorneys (via email BSullivan@MSKVT.com)

Enclosure

REFERENCE COPY

This is not an official FCC license. It is a record of public information contained in the FCC's licensing database on the date that this reference copy was generated. In cases where FCC rules require the presentation, posting, or display of an FCC license, this document may not be used in place of an official FCC license.



Federal Communications Commission
Wireless Telecommunications Bureau

RADIO STATION AUTHORIZATION

LICENSEE: INDUSTRIAL WIRELESS TECHNOLOGIES, INC.

ATTN: KEVIN P. DELANEY
INDUSTRIAL WIRELESS TECHNOLOGIES, INC.
40 LONE STREET
MARSHFIELD, MA 02050

Table with Call Sign (WRFM297), File Number (0008957690), and Radio Service (YD - SMR, 896-901/935-940 MHz, Auctioned)

FCC Registration Number (FRN): 0004036042

Table with columns: Grant Date, Effective Date, Expiration Date, Print Date, Market Number, Channel Block, Sub-Market Designator, Market Name, 1st Build-out Date, 2nd Build-out Date, 3rd Build-out Date, 4th Build-out Date

Waivers/Conditions:

Grant of the request to update licensee name is conditioned on it not reflecting an assignment or transfer of control (see Rule 1.948); if an assignment or transfer occurred without proper notification or FCC approval, the grant is void and the station is licensed under the prior name.

Spectrum Lease associated with this license. See Spectrum Leasing Arrangement Letter dated 07/20/2005 and File No. 0002197540.

Conditions:

Pursuant to §309(h) of the Communications Act of 1934, as amended, 47 U.S.C. §309(h), this license is subject to the following conditions: This license shall not vest in the licensee any right to operate the station nor any right in the use of the frequencies designated in the license beyond the term thereof nor in any other manner than authorized herein.

This license may not authorize operation throughout the entire geographic area or spectrum identified on the hardcopy version. To view the specific geographic area and spectrum authorized by this license, refer to the Spectrum and Market Area information under the Market Tab of the license record in the Universal Licensing System (ULS).

Licensee Name: INDUSTRIAL WIRELESS TECHNOLOGIES,

Call Sign: WRFM297

File Number: 0008957690

Print Date:

700 MHz Relicensed Area Information:

Market	Market Name	Buildout Deadline	Buildout Notification	Status
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Reference Copy