

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 24-3345- PET

Limited Size and Scope Application)
of Bell Atlantic Mobile Systems, LLC)
d/b/a Verizon Wireless and Vertex Towers, LLC,)
for a Certificate of Public Good,)
pursuant to 30 V.S.A. § 248a, authorizing the construction)
of a telecommunications facility in Manchester, Vermont)

**VERIZON AND VERTEX’S RESPONSE TO THE DEPARTMENT OF PUBLIC
SERVICE’S COMMENTS REGARDING VERIZON AND VERTEX’S APPLICATION
FOR A CERTIFICATE OF PUBLIC GOOD**

Bell Atlantic Mobile Systems, LLC, d/b/a Verizon Wireless (“Verizon”) and Vertex Towers, LLC (“Vertex”) (collectively, “co-applicants”), by their counsel, MSK Attorneys, hereby respond to the Department of Public Service’s (“DPS”) December 6, 2024 Comments regarding Co-Applicants’ Application for a Certificate of Public Good.

The DPS stated that the Co-Applicants’ petition did not provide an assessment pursuant to 30 V.S.A. 248a(c)(3) regarding why the additional towers not listed on the previous application were insufficient, “including those towers on Skyline Drive that were previously pointed out by the Department” (DPS Comments at Page 3).

30 V.S.A. 248a(c)(3) states “ If the proposed facility relates to the provision of wireless service, the proposed facility reasonably cannot be colocated on or at an existing telecommunications facility, or such colocation would cause an undue adverse effect on aesthetics.”

Co-Applicants filed testimony by Martin Lavin, which address this requirement as follows:

“As part of our analysis of this Project, we searched publicly available databases (see Exhibit ML-3) for existing telecommunications facilities and existing structures for possible collocation opportunities. No such facilities or structures that would allow Verizon to meet its coverage and capacity needs for the Manchester 2 search ring were identified.

The propagation plots that I have created for this site illustrate these difficulties. See Exhibit ML-2. **In particular, intervening terrain causes a sharp drop off in coverage as illustrated in those plots. The existing facilities both within the Town of Manchester and within a radius of ten (10) miles from the proposed site cannot provide adequate coverage to the area being served by this project. They are much too far away to provide coverage to the identified gap.** The closest existing facility suitable for a wireless installation (#3 in Exhibit ML-3) is approximately 1.3 miles from the Proposed Facility and Verizon is already installed on that tower. See Existing Tower Analysis (Exhibit ML-3).”

Prefiled Testimony of Martin Lavin at Page 3 [emphasis added].

The Skyline Drive sites are identified as #8 and #9 on Exhibit ML-3. There sites are located 3.7 and 4.0 miles from the proposed site, and, as discussed in the testimony, they are located too far away to provide coverage in the gap identified in Exhibit ML-2, which is the purpose of this project.

Dated in Burlington, Vermont this 9th day of December, 2024.

Respectfully submitted,

BELL ATLANTIC MOBILE SYSTEMS, LLC, D/B/A
VERIZON WIRELESS AND VERTEX TOWERS, LLC

BY: 

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