

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-____-PET

Application of New Cingular Wireless PCS, LLC d/b/a AT&T pursuant to 30 V.S.A. § 248a requesting a Certificate of Public Good for a de minimis modification to a wireless telecommunications facility in Richford, Vermont	
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DECLARATION OF DAVID FORD

I, David Ford, hereby state that the testimony and supporting exhibits submitted by me were prepared by me or under my direct supervision. I further certify that I am able to testify as to the validity of the information contained in my testimony and exhibits. I declare that the above statement is true and accurate to the best of my knowledge and belief. I understand that if the above statement is false, I may be subject to sanctions by the Commission pursuant to 30 V.S.A. § 30.

1. I am employed by Centerline Communications LLC (“Centerline”), a company contracted by New Cingular Wireless PCS, LLC d/b/a AT&T (“AT&T”) to assist with the provision of FCC-licensed wireless services within Vermont and New England. My title is Site Acquisition Manager and Site Acquisition and Zoning Specialist at Centerline, where I am responsible for managing the local and state municipal and environmental permitting processes, design and architectural / engineering services, and construction required for the development and installation of AT&T LTE projects. My resume is attached as Exhibit ATT-DF-01.
2. AT&T is proposing to modify telecommunications antennas and equipment at an existing telecommunications facility located at 254 Hardwood Hill Road, Richford, Vermont, on

property owned by Daniel Parsons and the Pamela Life Estate, et al, and managed vis-à-vis the tower facility by VB Acquisitions, LLC d/b/a Vertical Bridge, on behalf of Verizon Wireless.

3. The existing facility consists of a 139' monopole tower (the "Tower"), an equipment shelter, an emergency backup generator, and various equipment and appurtenances, all located within a gravel compound.
4. Currently, AT&T has six (6) panel antennas, each measuring approximately 96" x 20.7", mounted on the Tower at a centerline height of approximately 136' above ground level ("AGL"). AT&T also has twelve (12) remote radio head units ("RRUs) and two (2) surge suppressors installed on the Tower, together with various equipment and appurtenances located within the existing AT&T equipment shelter (the "Facility").
5. AT&T intends to make the following changes to the Facility (collectively referred to below as the "Project"), as detailed on the Site Plan attached as Exhibit ATT-DF-02:
 - a. Remove three (3) existing RRUS, each measuring 15" x 13" and having a total visible area of 4.05 square feet;
 - b. Install three (3) new antennas, each measuring 36.4" x 16.1" and having a total visible area of 12.21 square feet, and mounted on the facility at AGL centerline elevation of 138'-6";
 - c. Install three (3) new RRUs, each measuring approximately 20.6" x 15.6" and having a total visible area of 6.70 square feet, to be mounted behind the antennas; and
 - d. Remove, add and/or adjust cabling within existing conduits and make other minor adjustments necessary to complete the Project.

6. A Structural Analysis Report and Mount Analysis Report demonstrating that the Facility and related mounts are structurally capable of accommodating AT&T's antennas and equipment are attached as Exhibit ATT-DF-03 and Exhibit ATT-DF-06.
7. The Project qualifies as a "de minimis modification," pursuant to the definition set forth in 30 V.S.A. § 248a(b)(2), for the reasons set forth below:
 - a. The Project consists of the addition and /or replacement of telecommunications antennas and equipment primarily intended to serve a telecommunications facility.
 - b. Excluding equipment, antennas, and ancillary improvements, the Project does not involve increasing the height or width of the Tower.
 - c. As shown on the Site Plan, the maximum distance any new antenna or equipment will extend horizontally from the Tower is approximately 8'-6". *See* Project Information & Dimension Chart at C-4.2; Final Antenna Plan at C-5 (Exhibit ATT-DF-02). The existing and new antenna or equipment extends vertically from the Tower by a maximum of 1'. *Id.* at C-4.2. Thus, the "addition, modification, or replacement of an antenna or any other equipment on [the] facility or support structure does not extend vertically more than 10 feet above the facility or support structure and does not extend horizontally more than 10 feet from the facility or support structure." 30 V.S.A. § 248a(b)(2)(C).
 - d. The Project does not increase the surface area of the faces of the antennas and equipment on the Tower by more than 75 square feet. The faces of the existing antennas and equipment on the Tower have an aggregate surface area of approximately 105.69 square feet. *See* Site Plan at C-4.2 (Exhibit ATT-DF-02).
Upon completion of the Project, the aggregate surface area of the faces of the

antennas and equipment on the Tower will equal approximately 120.54 square feet.

Id. Therefore, the Project will result in a net increase in the surface area of the faces of the antennas and equipment on the Tower by approximately 14.85 square feet.

- e. The Project will not result in any additional impervious surface at the site. All operating equipment and appurtenances will be installed inside the existing AT&T equipment room located inside the facility. Thus, the Project does not increase the amount of impervious surface at the site by more than 300 square feet.
8. The Project will promote the general good of the State, consistent with 30 V.S.A. § 202c(b), insofar as the Project will expand and improve its wireless service coverage along VT Routes 105 and 139, and the surrounding area. AT&T is undertaking to improve and enhance its wireless network in the State to provide capabilities for use of devices employing AT&T's Long Term Evolution ("LTE") technologies.
9. Thus, the Project will contribute to the following State goals:
- a. "support the universal availability of appropriate infrastructure ... for transmitting voice and high-speed data" (Section 202c(b)(2));
 - b. "provide for high quality and reliable telecommunications services for Vermont businesses and residents" (Section 202c(b)(4));
 - c. "provide the benefits of future advances in telecommunications technologies to Vermont residents and businesses" (Section 202c(b)(5)); and
 - d. "support the application of telecommunications technology to maintain and improve ... the economic development of the state" (Section 202c(b)(7)).

10. AT&T obtained a Certificate of Public Good issued in Case No. 19-3123-PET on September 12, 2019. The Project is consistent with the conditions set forth in the CPG which is attached as Exhibit ATT-DF-05.
11. AT&T has obtained a Letter of Authorization from Vertical Bridge consenting to the proposed Project and authorizing AT&T to proceed with the Section 248a approval process. A copy of this letter is attached as Exhibit ATT-DF-06.



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