

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 St. Albans, Vermont	
--	--

DECLARATION OF WARREN KELLEHER

I, Warren Kelleher, 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 SAI Group, LLC (“SAI”), 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 Director – Site Acquisition of Northern New England, where I am responsible for coordinating the siting of facilities and overseeing construction personnel to complete the installation and development of AT&T projects. My resume is attached as Exhibit ATT-WK-01.
2. AT&T is proposing to modify telecommunications antennas and equipment at an existing telecommunications facility mounted on a multi-structure industrial mill complex (the “Support Structure”), having a maximum height of 138’-6” above ground level (“AGL”),

and located on property that has an E-911 address of 79 Walnut Street, St. Albans, Vermont, and owned by Nutra Blend LLC.

3. The existing telecommunications facility consists of antennas and ancillary equipment mounted on the rooftop of a section of the Support Structure, equipment shelter, and various equipment cabinets and appurtenances, all located within a fenced-in gravel compound on the ground adjacent to the Support Structure (the “Compound”).
4. AT&T currently has nine (9) panel antennas, eighteen (18) remote radio head units (“RRUs”) and six (6) surge arrestors installed on the rooftop at a centerline height of approximately 81’-6” above ground level (“AGL”), 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-WK-02:
 - a. Remove nine (9) existing antennas, including three (3) measuring approximately 75.5” x 10.3”, three (3) measuring approximately 72” x 14.8”, and three (3) measuring approximately 72” x 12”, having a total visible area of 56.4 square feet;
 - b. Remove nine (9) existing RRUs, including six (6) measuring approximately 20.4” x 18.5” and three (3) measuring approximately 19.7” x 17”, having a total visible area of 22.71 square feet;
 - c. Install nine (9) new antennas, including three (3) measuring approximately 28.2” x 16.1”, five (5) measuring approximately 71.2” x 20.7”, and one (1) measuring

approximately 72” x 19.6”, to be mounted at a centerline height of 81’-6” AGL and having a total visible area of 70.44 square feet;

- d. Install six (6) new RRUs, including three (3) measuring approximately 16.5” x 13.4” and three (3) measuring approximately 17.5” x 15.1”, to be mounted behind that panel antennas at a centerline height of 81’-6” AGL, and having a total visible area of 10.12 square feet;
 - e. Add and/or adjust cabling within existing conduits and make other minor adjustments necessary to complete the Project.
6. A Structural Analysis Report demonstrating that the Support Structure and related mounts are structurally capable of accommodating AT&T’s antennas and equipment are attached as Exhibit ATT-WK-03.
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 Support Structure.
 - c. As shown on the Site Plan, no antenna or equipment will extend more than 10 feet vertically or horizontally from the Support Structure. *See* Site Plan at Sheet Nos. C-1 (Plot Plan), A-3 (Proposed Antenna Layouts), A-4 (Elevation) (Exhibit ATT-WK-02). All antennas and equipment will extend a maximum of 1’-10” horizontally from the Support Structure, and will not extend above the Support Structure. *Id.* at C-1, A-

- 3, and A-4. 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 Support Structure by more than 75 square feet. The faces of the existing antennas and equipment on the Support Structure have an aggregate surface area of approximately 111.23 square feet. *See* Site Plan at C-1 (Exhibit ATT-WK-02). Upon completion of the Project, the aggregate surface area of the faces of the antennas and equipment on the Support Structure will equal approximately 112.68 square feet. *Id.* As a result of the Project, the surface area of the faces of the antennas and equipment on the Support Structure will increase by approximately 1.45 square feet.
- e. The Project will not result in any additional impervious surface at the site. All on-the-ground equipment and appurtenances will be installed within the Compound. 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 in St. Albans City 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. To the best of my knowledge, after due diligence, the Project is subject to CPGs issued in Docket No. 8121 (October 9, 2013), Docket No. 8532 (June 24, 2015), Case No. 17-4629-PET (December 15, 2017), and Case No. 19-2470-PET (August 8, 2019), authorizing de minimis modifications to the Facility. In addition to the CPGs referenced above, the facility is subject to conditional use and site plan approval granted to RCC Atlantic, Inc. by the St. Albans Development Review Board on November 30, 2005 and January 4, 2006, respectively, authorizing installation of antennas and equipment at the site. The St. Albans Development Review Board also granted T-Mobile site plan approval on January 23, 2009, as amended on February 17, 2009. The Project is consistent with the conditions set forth in the prior permits and approvals, all of which are attached as Exhibit ATT-WK-04.

11. AT&T has obtained a Letter of Authorization 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-WK-05.

[Signature block on following page.]

Name: Warren Kelleher
Title: Director – Site Acquisition of
Northern New England
SAI Group, LLC
12 Industrial Way
Salem, NH 03079

Date: April __, 2025