

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-1543-PET

Limited Size and Scope Application of Bell Atlantic Mobile Systems, LLC d/b/a Verizon Wireless and The Towers, LLC d/b/a Vertical Bridge, for a Certificate of Public Good, pursuant to 30 V.S.A. § 248a, authorizing the construction of a telecommunications facility in Marshfield, Vermont	
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**INTERVENORS' FIRST SET OF INTERROGATORIES, REQUESTS TO PRODUCE,
AND REQUESTS TO ADMIT**

Pursuant to PUC Rules 2.214 and 2.230, Intervenors Robert Buchanan, Weston Cate, Robin Gomez, Pam Quinn, and Michael Xenakis, through counsel, DesMeules Olmstead & Ostler, hereby request that Petitioner Bell Atlantic Mobile Systems, LLC d/b/a Verizon Wireless and The Towers, LLC d/b/a Vertical Bridge answer the following interrogatories, requests to produce, and requests to admit, under oath, and produce copies of the documents described herein.

DEFINITIONS

The following definitions apply to the following discovery requests:

DEFINITIONS AND INSTRUCTIONS

1. The terms “You”, “Yours” or “Petitioner” or “Applicant” shall mean the applicant designated in the caption of this action, including their agents or representatives, if any.
2. The term “Petition” means the Petition filed in this action by the Applicant on July 29, 2025.
3. The term “Bell Atlantic Mobile Systems, LLC,” “Verizon Wireless and The Towers, LLC,” or “Vertical Bridge” means the Applicant, including any officers, employees, or agents acting on its behalf.

4. These requests shall be deemed continuing and must be supplemented in accordance with PUC Rule 2.230(D). Petitioner is directed to change, supplement and correct its answers to conform to all information as it becomes available to Petitioner, including the substitution of actual data for estimated data. Responses to requests for information covering a period not entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.
5. The term “Project” or “Site” means the precise location of the tower, including the curtilage, which is the subject matter Petitioner’s application, and the “Premises” shall refer to the entire leased property there.
6. If you are asked to identify or state the identity of a person, you are to state his or her name, employer, job description or title, business address, business telephone number, and home address.
7. If you are asked to identify or state the identity of a document, you are to describe the document with particularity sufficient to require its production if such description were used to request production.
8. Where knowledge or information in the possession or control of Petitioner is requested or inquired of, such request or inquiry includes knowledge or information, possession or control of or by its agents, servants, representatives, and unless privileged, its attorneys.
9. Intervenors reserve the right to submit additional information requests to Petitioner.
10. If a claim of privilege is made with respect to an interrogatory or document request, a document or any part thereof, specify the exact ground or grounds of the privilege claimed and

give sufficient particulars concerning the response or document to allow the PUC to rule on the claim, including the author, all recipients, date and subject matter of the document.

11. To the extent any interrogatory may be construed to call for either a narrow or comprehensive response, the comprehensive response should be provided. To the extent any interrogatory may be construed to call for either a general or detailed response, the detailed response should be provided.

12. These interrogatories are to be deemed continuing, requiring Petitioner to further respond by verified supplemental answer setting forth any additional information within the scope of the interrogatories subsequent to each original answer.

13. The term “concerning” means, without limitation, relating to, referring to, describing, evidencing, computing, analyzing and constituting.

14. The term “communication” means any transfer or exchange between two or more persons or entities of any information in the form of facts, ideas, inquiries or otherwise including, but not limited to, personal conversations, correspondence, telephone calls, telegrams, telexes, telefaxes, texts, electronic mail, oral statements or other transmission.

15. The term “identify,” when used in reference to any person other than a natural person, means to state to the fullest extent possible the full name and present or last known address of the principal place of business of the corporation, partnership, proprietorship, association, or other organization to be identified.

16. As used in these discovery requests the term “documents” shall be defined in a comprehensive sense and means any kind of internal and/or external written, typewritten, hand-printed, electronic or recorded material whatsoever, including any records, papers, correspondences, emails, texts, or notes which relate in any manner to the subject matter of the

litigation, and includes originals, drafts, and non-identical copies. “Writings” and “documents” shall be interchangeable.

17. All other terms are to be given their plain, ordinary meaning unless specifically directed otherwise hereinabove or below.

INTERROGATORIES

1. Identify each person with whom you consulted with in preparing answers, responsive productions, and admissions to Intervenors’ discovery requests herein.
2. Identify each person you consulted with or from whom you obtained analysis or opinions but determined not to use as a witness.
3. State whether any alternative sites were considered other than the Botheleed Hill Road Silo site as discussed in the Direct Prefiled Testimony of Martin Lavin at page 4.
4. State with specificity what software Martin Lavin used to produce the propagation plots he testified to in the Direct Prefiled Testimony of Martin Lavin at page 4, line 13.
5. State with specificity what sources Martin Lavin used to determine the area’s topography as referenced in the Direct Prefiled Testimony of Martin Lavin at page 4.
6. State Martin Lavin’s total compensation for his services as an expert witness in this matter, including his hourly rate.
7. Identify all documents and other communications created by or on behalf of Applicant, its employees, agents, or contractors, comprising community outreach relative to this project, including but not limited to site selection, and the “balloon test” simulation event.

8. Describe with specificity the maximum antenna capacity of the proposed tower, including in your response the maximum number of cell and radio partner antennas which could potentially be installed on the tower.
9. State whether Applicant, its agents, contractors or employees conducted tests for radio receptivity with differing heights at alternative sites in Marshfield. If so, identify and produce any and all documentation of these test results.
10. Identify and produce any and all communications or documentation comprising the lease agreement or contract between Applicant and the landowner for the tower site, including but not limited to the terms of site access and right-of-way maintenance, financial payments, and assignment of liabilities.
11. Identify each and every person, including by name, title, relevant experience or qualifications, and employer, who conducted the balloon float test and who Louis Hodgett refers to as “We” in the Direct Prefiled Testimony of Louis Hodgett at page 6, line 11.
12. State whether Louis Hodgett was present at the visibility analysis in and around Marshfield.
13. State who took each photo in Exhibit LH-4.
14. Identify who created Exhibit LH-4, and describe with specificity the method by which it was created, including the identification of any and all software, including that software referenced in the Direct Prefiled Testimony of Louis Hodgett page 6, line 13.
15. State with specificity each person who worked on the “photosimulations” referenced in the Direct Prefiled Testimony of Louis Hodgett at page 6, line 11.
16. State the reasons for choosing to take photos from each location in Exhibit LH-4.
17. State the make and model of camera or device, including any lenses, film, and support device (such as a tripod) that was used to capture the images used in LH-4.

18. Identify each and every person, including by name, title, relevant experience or qualifications, and employer, who created the plans depicted in Exhibit LH-1 for the following pages: C-2, C-3, C-4, C-5, C-6, C-7, E-8, and EB-1.
19. State Louis Hodgett's total compensation for his services as an expert witness in this matter, including his hourly rate.
20. State Grace Glynn's qualifications to identify, delineate, flag, and record wetlands as described in the Direct Prefiled Testimony of Louis Hodgetts at page 7, lines 11-16, and Exhibit LH-5.
21. State Grace Glynn's total compensation for her services as an expert witness in this matter, including her hourly rate
22. State what GPS device Grace Glynn used, including make and model number, to record wetland boundaries around the Project Site.
23. State what software Grace Glynn used to prepare the images in Exhibit LH-5.
24. State why there is no photo of Wetland C in Exhibit LH-5.

REQUESTS TO PRODUCE

1. Produce all correspondence, contracts or agreements in relation to this Project among or between Applicant and its agents or employees and any cellular antenna providers, including but not limited to cell phone companies, and public and emergency service providers.
2. Produce all photos, videos, field notes and documentation including communications and analysis regarding the balloon test(s), including those not included in any exhibit or prefiled materials.
3. Produce the "standard operating procedures and refueling plans" referenced on page 6 at lines 1-2 of the Direct Prefiled Testimony of Louis Hodgett.

4. Produce any and all documents concerning the decision to redesign the project as described in the Direct Prefiled Testimony of Louis Hodgett at Page 9, Lines 11-14.
5. Produce any and all documents concerning Grace Glynn’s evaluation, review, and site visit to the Project Site as they relate to the wetlands described as Wetland A, Wetland B, and Wetland C.
6. Produce any and all documents concerning the Botheveled Hill Road Silo alternate site.
7. Produce any and all data sets used by Martin Lavin to produce the propagation plots he testified to in the Direct Prefiled Testimony of Martin Lavin at page 4, line 13.
8. Produce all documents and other communications created by or on behalf of Applicant, its employees, agents, or contractors, comprising community outreach relative to this project, including but not limited to site selection, and the “balloon test” simulation event.
9. Produce any and all documents produced for purposes of this application and/or this litigation by persons with whom you consulted but who you decided, for whatever or any reason, to not use as an expert witness.

REQUESTS TO ADMIT

1. Admit that Applicant, its agents, contractors and employees created no simulations from the perspective of private property locations during the balloon test.
2. Admit that Louis Hodgetts is not an aesthetics expert.
3. Admit that Louis Hodgetts is not an acoustics expert.
4. Admit that Louis Hodgetts is not a landscape architect.
5. Admit that Louis Hodgetts is not a land-use planner.
6. Admit that Louis Hodgetts is not a biologist or ecologist.
7. Admit that Louis Hodgetts is not a wetlands expert.

8. Admit that Louis Hodgetts is not an economics expert.
9. Admit that Louis Hodgetts is not an expert in internet service as it relates to economics.
10. Admit that Louis Hodgetts is not a photography expert.
11. Admit that Marvin Lavin is not a mapping expert.
12. Admit that Marvin Lavin never visited the Project Site.
13. Admit that the District Wetlands Ecologist has not reviewed Wetland A.
14. Admit that the District Wetlands Ecologist has not reviewed Wetland B.
15. Admit that the District Wetlands Ecologist has not reviewed Wetland C.
16. Admit that Grace Glynn is not a wetlands expert.
17. Admit that Grace Glynn does not have a PhD.
18. Admit that Grace Glynn is not an expert in identifying and delineating the boundaries of a wetland.
19. Admit that a Class II wetland buffer intersects with the proposed access drive.
20. Admit that a Class II wetland buffer intersects with the leased premises.

Dated at Norwich, Vermont this 14th day of November, 2025.

BY: DesMeules, Olmstead & Ostler

Signed: /s/ Andrew D. Cliburn
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