STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 25-_____-PET

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

LIMITED SIZE AND SCOPE APPLICATION OF VERTEX TOWERS, LLC AND BELL ATLANTIC MOBILE SYSTEMS, LLC d/b/a VERIZON WIRELESS FOR A CERTIFICATE OF PUBLIC GOOD PURSUANT TO 30 V.S.A. SECTION 248a

By this Application, Vertex Towers, LLC ("Vertex") and Bell Atlantic Mobile Systems, LLC, d/b/a Verizon Wireless ("Verizon") (together "Applicant"), represent:

1. The Applicant is a "company" as defined by 30 V.S.A. § 201 and, as such, is subject to the jurisdiction of the Vermont Public Utility Commission ("Commission") pursuant to 30 V.S.A. § 203.

2. The proposed Project involves a "telecommunications facility" as defined by 30 V.S.A. § 248a(b)(6).

3. Vertex proposes to construct a permanent telecommunications facility on a parcel ("Parcel") at 1030 Route 100 South, Rochester, Vermont for use by Verizon and future co-locators. The Applicant refer to the project as the "Rochester". The property owner has given Vertex and Verizon permission to proceed with this Application. The coordinates for the Project are latitude 43°51'35.39" North and longitude 72°47'53.37" West. *See* Permit Plans (Exhibit SA-1; "Plans") for a visual depiction of the Project's location.

4. Vertex will create a 50' x 50' enclosed compound ("Compound") enclosed by an 6'

high chain link fence, with a locked gate. Vertex will construct a new 140' above ground level ("AGL") self-supporting lattice tower ("Tower") within the Compound. Verizon will place three (3) sectors of three (3) panel antennas ("Antennas") each on the Tower for a total of nine (9) Antennas. At each sector, Verizon will install two (2) Remote Radio Heads ("RRHs") for a total of six (6) RRHs. Each of the Antennas will be mounted at a centerline height of 135'AGL. Six (6) of the Antennas will measure approximately 72" long and 11.9" wide each. The remaining three (3) Antennas will measure approximately 28.90" long and 15.75" wide each. The topmost point of the Antennas will extend to a height of approximately 138' AGL.

5. Due to their position behind the Antennas, the RRHs should not be visible to most viewers. Three (3) of the RRHs will measure approximately 14.96" long and 14.96" wide; the other three (3) will measure approximately 15" by 15." The topmost points of the RRHs will not exceed the topmost points of the Antennas. Behind one of the sectors, Verizon will install one (1) OVP distribution box ("OVP"). The topmost point of the Box will not exceed the topmost points of the Antennas. The OVP measures approximately 29.5" long by 16.5" wide. Full and accurate specifications of the proposed Antennas, RRHs and OVP are detailed in Exhibit ML-1[1]

6. Full and accurate specifications of the proposed Antennas, RRHs and OVP are detailed in Exhibit ML-1[2]

7. The Tower has been designed to support the proposed equipment and additional capacity for future modifications or collocation.

[1] From time to time, equipment manufacturers may slightly alter their products or Verizon may purchase from different suppliers. Therefore, there is a possibility that the actual antennas, remote radio heads and/or distribution boxes may differ slightly from what is described in the attached specifications.

[2] From time to time, equipment manufacturers may slightly alter their products or Verizon may purchase from different suppliers. Therefore, there is a possibility that the actual antennas, remote radio heads and/or distribution boxes may differ slightly from what is described in the attached specifications.

8. Verizon will place the 12' by 20' Shed on the ground to the north of the Tower. The exact location of the Shed is depicted on Sheet Z-3 of the Permit Plans. The Shed will have cabinets that will contain the electronics equipment necessary for the operation of the Project. Verizon will place an emergency generator ("Generator") on a concrete pad adjacent to the Shed. The Generator will function if there is a power outage. Verizon will remotely test the Generator once a week at a time to be determined. To fuel the Generator, Verizon will use diesel contained in a fuel tank under the Generator.

9. Vertex will improve an existing logging path that connects to Route 100 South as depicted on the Permit Plans (the "Access") to provide Verizon and future co-locators access to the Compound.

10. Vertex will run underground power and telecommunication lines along the Access from Route 100 South to the edge of the tree line as shown on Sheet Z-1.1 of the Permit Plans, thereafter the lines will continue above ground along the Access to a 4 Slot Multi Gang Meter Board. Verizon will run underground lines from the Meter Board to the Shed and will run cables over an ice bridge from the Shed to the Tower.

11. Construction of the Project will result in approximately 1,500 square feet of new impervious surface and approximately 57,978 square feet of tree clearing. [3]

12. After the completion of construction, total permanent earth disturbance will be approximately 8,833 square feet.

13. At the close of construction, Vertex will reseed and mulch all disturbed areas around the Access and around the Compound. Check dams, waterbars and silt fencing will be placed

[3] Depending on conditions encountered in the field during construction, the actual amount of clearing and new permanent impervious surface may vary from these estimates. Further, this figure does not take into account existing cleared areas along the Access.

along the Access and at the Compound as indicated on the enclosed plans as necessary to control erosion both during and after construction. *See* Permit Plans (Exhibit SA-1). Construction shall meet the requirements of the State of Vermont Low Risk Site Handbook for Erosion Prevention and Sediment Control. Vertex will obtain a Stormwater Construction Discharge Permit prior to the commencement of construction.

Co-Location Analysis

14. As part of the design for this Project, RF engineers from C-Squared Systems evaluated existing telecommunications facilities and existing structures for possible co-location opportunities. There are no such structures that would meet Verizon's needs for this site.

15. The existing facilities both within the Town of Rochester (of which, there is only one, the church steeple identified as #9 on Exhibit ML-2) 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 or Verizon is already installed on the facility. The closest facility is the Church Steeple (See #9 on Exhibit ML-2). As discussed in the pre-filed testimony of Scott Adams, the existing structure could not support another carrier, but even if it could, the coverage it would afford would not be adequate to meet the coverage goals of this project. (See Exhibit ML-4 - Alternative Site Propagation Plots at Page 2). Verizon is already located on the next closest existing facilities suitable for a wireless installation (See #2, #3, #4, #6, #7 in Exhibit ML-2). Therefore, the closest existing facility that would be viable for co-location is #8 as shown on Exhibit ML-2, which is located 9.4 miles from the proposed facility. As shown on Exhibit ML-4 at Page 4, the coverage from this facility would not provide adequate coverage to the Town of Rochester, nor the Route 100 corridor, which is the purpose of this project.

Accordingly, there is not viable option for Verizon to co-locate on an existing facility and meet its coverage objectives.

Analysis of Effects Under Applicable Criteria

16. The proposed Project will not have an adverse impact affecting the applicable criteria under 10 V.S.A. § 6086(a) and will conform to the land conservation measures in the applicable local and regional plans.

Criterion 1(B) – Waste Disposal – Following construction, the proposed Project will not generate any waste. Construction waste generated during construction of the project will be removed from the site and recycled or disposed of at approved waste processing facilities.

The only consumable on site will be fuel for the Generator. It and its fuel tank are designed with secondary containment and engine systems/fueling containment, including a double wall outdoor rated fuel tank with a rupture basin alarm and overflow basins to collect any spills. *See* Exhibit SA-2 for containment specifications for the proposed Generator. Verizon has standard operating procedures to limit any potential spill during refueling.

Criterion 1(D) – Floodways – The Project is not located within a floodway or mapped flood plain. *See* Exhibit SA-3 for FEMA Firmette. Therefore, the Project will not have an undue adverse impact under this Criterion.

Criterion 8 – Scenic Beauty, Historic Sites and Natural Areas – With regard to Scenic Beauty, on November 26, 2024, AEG visited the proposed site and floated a three (3) foot diameter balloon to 140 AGL' at the location of the proposed tower. From available mapping and with the balloon in the air, AEG drove public roads within a radius of the tower site to determine from how many viewpoints the tower could be seen, and if visible, how much of the tower would be visible. AEG identified twenty-one (21) representative viewpoints. The balloon was visible (marking the highest

point of the tower) from four (4) points and was visible, but obscured from four (4) points. It was not visible from the remaining thirteen (13). Using several software programs, the photos and photo metadata, AEG is able to accurately represent a tower with photo simulations to demonstrate the tower's visibility. The photo simulation package is attached as Exhibit SA-4. Based on the photo simulations, the tower will have limited visibility from public right of ways, including Route 100. As shown in the photo simulations, the visibility of the tower is limited due to the distance from the tower site to public roads, the height of the surrounding areas, as well as the topography of the area. In addition, the initial proposed height for the Tower was 176' AGL, following concerns raised regarding the aesthetic impacts, the Petitioner re-designed the tower to 140' AGL to mitigate the visual impacts.

For these reasons, the Project will have no adverse effect, let alone an undue adverse effect, on the scenic beauty of the area.

With respect to Natural Areas, EBI Consulting conducted a Natural Resources Review of the Project, the findings are outlined in a Natural Resources Report dated June 20, 2025 (See Exhibit SA-5 Natural Resources Review). The report concluded the proposed telecommunications facility is not likely to adversely affect any critical or endangered species, or associated habitats (provided the conservation measures discussed below are implemented). Further, it is not within any rare of irreplaceable natural area. It is not within the boundaries of a FEMA-designated 100-year flood zone or jurisdictional wetland. See Exhibit SA-5 at 12. To the extent the Project could impact bat roosting, the Project will utilize downward-facing, full cut-off lens lights and direct any temporary lighting away from suitable northern long-eared bat and/or tricolored bat roosting habitat when bats may be present (April 15 - October 31). In addition, any tree trimming/clearing, as well as drilling/blasting will occur during hibernation season between November 1 and April 14." Id. at 8 and best management practices (BMPs)

(i.e. silt fencing, wattles, erosion controls, etc.) will be employed during construction to ensure stormwater runoff does not carry construction related debris. Id. at 11.

With respect to Wetlands, the Review notes as follows: Arrowwood Environmental of Huntington Vermont completed a 'Wetland at the proposed Rochester, Vermont Vertex Tower Site' memo. This memo identified two very small wetlands (Wetland A and Wetland B) located in low spots within the existing dirt access road. The wetlands are shallow emergent marsh wetlands and the vegetation is dominated by reed canary grass, sedges, tall buttercup, and sensitive fern. There is no permanent standing water in either wetland, although after heavy rain there may be temporary pooling of water in the wetlands. Based on a site visit on November 13, 2023, the Vermont state District Wetland Biologist classified these wetlands as Class III and therefore they are not regulated under the Vermont Wetland Rules. See Exhibit SA-5 at Pages 10, 94-95.

During the advance notice period, the Applicant received comments from the Agency of Natural Resources with raising concerns with respect to potentially adverse impacts on Rogers Brook. However, following further review it was determined that the initial permit plans filed with the advance notice mislabeled a seasonal brook as Roger Brook, which does not in fact cross onto the subject parcel as shown on the Permit Plans at Sheet C-1. Prior to filing the Petition, the Applicant received comments from the Agency of Natural Resources requesting that the in the event the existing culverts shown on the Permit Plans at Sheet Z.2.3 and Z.2.4 fail during or after construction, they be replaced with culverts that are appropriately sized to meet Q50 flow standards. The Applicant agrees to this condition and will comply in the event the existing culverts fail. The Agency of Natural Resources also proposed seasonal restrictions as the project site is within a deer wintering area (between December 15 and April 15) and the incorporation of non-native species prevention. The Applicant is willing to accommodate these proposed conditions and welcomes input from the Agency of Natural Resources during the public comment period to ensure the restrictions with respect to bat hibernation and deer wintering achieve

the Agency's conservation goals. Accordingly, the project will not have an undue adverse effect on natural resources.

With regard to Historic Sites, on December 11, 2024, EBI Consulting performed a review under Section 106 of the National Historic Preservation Act concluding the finding of the effect is "No Historic Properties in the Area of Potential Effects – Direct Effects" and "No Historic Properties in the Area of Potential Effects – Visual Effects" (See Exhibit SA-6 Historic Resources Review). The Historic Resource Review was initially provided to the Vermont Division for Historic Preservation ("SHPO") on April 10, 2024. SHPO responded on May 7, 2024 requesting additional information. Following the initial submission, the project design was revised, reducing the proposed tower height from 176' AGL (total height of 186' AGL) to 140' AGL. The revised plans and responses to SHPO's request for information were provided in the December 11, 2024 letter. SHPO concurred with the December 11, 2024 letter, indicating "no historic properties affected" on December 26, 2024. Accordingly, the project will have no adverse effect, let alone an undue adverse effect, on historic resources

Criterion 10 – According to 30 V.S.A. § 248a(c)(2), during the Commission's review, "substantial deference [will be] given to the land conservation measures" in the local and regional plans of the "affected municipality." We are, therefore, addressing the relevant provisions of the Town of Rochester Town Plan (adopted on April 27, 2020) ("Town Plan"; excerpts in Exhibit SA-7) and the Two Rivers-Ottauquechee Regional Plan (adopted February 26, 2025) ("Regional Plan"; excerpts in Exhibit SA-8) to illustrate that the proposed Project will comply.

The Town Plan includes the following section dedicated to Telecommunications (See Town Plan, Pages 15-16) and we accordingly respond in turn to each subsection:

> Telecommunications facilities are subject to review and approval by the Vermont Public Utilities Commission (PUC) under 30 VSA §248a. Under these laws, prior to the

construction of a generation or telecommunications facility (that is part of a network), the Board must issue a Certificate of Public Good. A Section 248a review addresses environmental, economic, and social impacts associated with a project, like Act 250. In making its determination, the Board must give due consideration or substantial deference to the recommendations of municipal and regional planning commissions and their respective plans similar to the Act 250 process. Accordingly, it is appropriate that this Plan address these land uses and provide guidance to town officials, regulators, and utilities.

For all telecommunications facilities, the following policies shall apply

1. Preferred Locations: New telecommunications facilities shall be sited and designed in locations that reinforce the town's traditional patterns of growth, of Rochester's compact village center surrounded by a rural countryside, including farm and forest land.

Response: The proposed tower site has been sited in such a way to reinforce the town's traditional patterns of growth by providing improved coverage to the compact village center as well as Route 100. This improved coverage will encourage and support existing businesses and new business development in the compact village center. As shown on Exhibit ML-3, currently there is a significant gap in coverage along Route 100 south of Rochester. This impacts travelers and businesses using this coordinator. The Project resolves this existing gap in coverage. See Pre-filed Testimony of Martin Lavin. The site has been selected to have a minimal impact on the rural countryside, avoiding productive agricultural land and utilizing existing logging roads for the Access where feasible. During the due diligence for this site, the Petitioner review existing facilities to determine if co-location would be feasible, no such facilities exist. See Pre-filed Testimony of Martin Lavin at Pages 3-4 and Exhibit ML-2 and ML-4. With respect to the existing facility located within the Church Steeple at 15 Main Street, Rochester. Scott Adams reviewed the associated permit plans

Entitled: Rochester Federated Church, Prepared By: Hudson Design Group, Prepared For: AT&T, Dated: 01/28/10 (attached as Exhibit SA-9). It is his professional opinion that the existing structure could not support an additional carrier in its current condition, as it would require a spire replacement and extension of the spire as well as other substantial structural modifications.

2. Prohibited Locations: Because of their distinctive natural, historic or scenic value, telecommunication facility development shall be excluded from the following areas:

• Floodways shown on FEMA Flood Insurance Rate Maps (except as required for hydro facilities)

• Fluvial erosion hazard areas shown on Fluvial Erosion Hazard Area maps (except as required for hydro facilities)

• Wetlands as indicated on Vermont State Wetlands Inventory maps or identified through site analysis.

• Rare, threatened or endangered species habitat or communities

Response: The Tower site is not located in a floodway or floodplain (See Exhibit SA-3). The Town Plan does not include "Fluvial Erosion Hazard Maps" however, as the Applicant understands the term to require sighting away from areas prone to erosion risk, this Project complies with that objective. The Project is sited along an existing logging road with relatively with erosion and sediment controls employed during construction to mitigate any risk. The Project is not located in a wetland or wetland buffer and will not impact jurisdictional wetlands. See Exhibit SA-5. No rare, threated or endangered species habitat, or communities were located on the project site. See Id.

3. Significant Areas: All new telecommunications facilities shall be sited and designed to avoid or, if no other reasonable alternative exists, to otherwise minimize or mitigate adverse impacts to the following:

• Historic districts, landmarks, sites and structures listed, or eligible for listing, on state or national registers.

• Public parks and recreation areas, including state and municipal parks, forests and trail networks.

• State or federally designated scenic byways, and municipally designated scenic roads and viewsheds.

• Special flood hazard areas identified by National Flood Insurance Program maps (except as required for hydro facilities)

• Public and private drinking water supplies, including mapped source protection areas.

Response: The project is sited to avoid any impacts to Historic districts, landmarks, sites and structures listed, or eligible for listing, on state or national registers. The closest location eligible for historic designation is the Village of Talcville, which is over half a mile from the proposed tower site. See Exhibit SA-1. The project will have limited visibility in that location due to the height of the trees surrounding the tower site, and therefore, will not have an adverse impact on public parks and recreation areas, including state and municipal parks, forests and trail networks. If anything, improved cell coverage will enable more residents and visitors to utilize the trail systems in a safe manner with better access to cellular coverage in the event of an emergency. The Project will not have an undue adverse impact on scenic byways, the project is designed to improve coverage along the Route 100 corridor (See Pre-filed Testimony of Martin Lavin at Pages 3-4 and Exhibit ML-3). As shown on the photo simulations, visibility of the facility will be limited from Route 100. See Exhibit SA-4. The Project is similar to many other towers build along Route 100 designed to provide cellular coverage to one of Vermont's busiest state highways. Any visual impact is further mitigated by tree screening of the enclosure, topography, and a lowered height of 140'. The project is

unmanned and will not require water or wastewater disposal systems, and therefore, will not have an adverse impact on public and private water supplies.

Response: The Town of Rochester Zoning Regulations contain one section dedicated to Telecommunications Facilities/Towers, which states "a non-networked telecommunications facility shall maintain front, side and rear setbacks that are 150% of the facility's height." (Zoning Regulations at Page 41). The proposed tower is 140' AGL, the nearest property boundary is 341' See Permit Plans at Sheet C-1. Therefore, the Tower complies with this requirement as the setback is greater than 210' or 150% of the facility's height.

5. Natural Resource Protection: New telecommunications facilities must be sited to avoid the fragmentation of, and undue adverse impacts to the town's working landscape, including large tracts of undeveloped forestland, open farm land, and primary agricultural soils mapped by the US Natural Resource Conservation Service.

Response: The access to the tower utilizes an existing logging road/snowmobile trail where possible. It is sited such that it will not have an impact on open farm land or primary agricultural soils.

6. Protection of Wildlife: Designers must gather information about natural and wildlife habitats that exist in the project area and take measures to avoid any undue adverse impact on these resources. Consideration shall be given to the effects of the project on: rare, threatened, and endangered species; the impacts of human activities at or near habitat areas; and any loss of vegetative cover or food sources for critical habitats for rare, threatened or endangered species.

Response: The Petitioner completed a review of natural resources (See Exhibit SA-5). There are no rare, threatened, and endangered species within the project parcel, and therefore, the project will not have an undue adverse impact on these species, their food sources, or habitats. As noted in the

Prefiled Testimony of Scott Adams (see Pages 6-7), the Petitioner will take additional steps to mitigate adverse impacts on natural resources.

> 7. Site Selection: Site review should not be limited to the telecommunications facilities; other elements required of the facility need to be considered as well. These include access roads, site clearing, onsite power lines, substations, lighting, and off-site power lines. Development of these elements shall be done in such a way as to minimize any negative impacts. Unnecessary site clearing, and highly visible roadways can have greater visual impacts than the telecommunication facility itself. In planning for facilities, designers should take steps to mitigate their impact on natural, scenic and historic resources and improve the harmony with their surroundings.

Response: The Petitioner has designed this site to minimize negative impacts. The initial proposal was for a 176' AGL tower (See June 12, 2024 Advance Notice, 24-1814-AN). Following feedback from the Town of Rochester, the Petitioner reduced the proposed Tower height to 140' AGL. To avoid unnecessary clearing, the Access will follow an existing logging road, which will be expanded to the minimum width required to support the facility, further limiting the access roads visibility.

> When surveyed in 2012, residents were very supportive of increasing cell coverage throughout the community depending on the location of the proposed telecommunications towers. Residents indicated that Deer Mountain, Alexander Hill and Mount Reeder would be the most acceptable locations for a telecommunications tower, while Mount Cushman, Rochester Mountain and Austin Hill would be the least. Developers should locate telecommunications towers accordingly.
>
> Town Plan at Page 15-16.

Response: The proposed project is not located on Mount Cushman, Rochester Mountain or Austin

Hill.

The Petitioner also received public comments from the Town of Rochester Planning Commission during the advance notice period (See 25-1056-AN). The majority of areas of concern raised by the Planning Commission pertain to natural resources and the Planning Commission asked for assistance from the State agencies in reviewing the project. (forests, wetlands, habitat and species, flooding, roads and drainage), with respect to those items, Petitioner directs the Town to the responses above and Exhibit SA-3, SA-5, and SA-6. With respect to visibility and aesthetics, the petitioner highlights Exhibit SA-4. For the discussion of co-location, Petitioner refers to the Prefiled Testimony of Martin Lavin at Pages 3-4 and Exhibits ML-2 and ML-4. While the Planning Commission indicates they will ask the Petitioner to post a tower, structure, and equipment removal bond, we note that no such requirement is contained within the Town Plan nor the Town Zoning Bylaws. The only references to bonds in the Zoning Regulations are contained in the sections on forestry operations and earth resource extraction (See Zoning Regulations Page 7-8 and Page 38, included in Exhibit SA-7). Vertex has an obligation under the terms of their lease with the property owner to remove the facility once the tower is no longer used by carriers.

The Project will enhance the telecommunications services available to residents of and visitors to the Town of Rochester, which may attract new business development. Verizon has designed the project to minimize the adverse effect on the character and aesthetics of that municipality.

The Regional Plan contains a section dedicated to Telecommunications, which starts with the following observation:

> "Information technology (such as broadband Internet and wired/wireless telecommunications) has become essential to residents and businesses in the Region. Our economy, educational systems, and functionality of our homes rely on ubiquitous availability

of data and communications for our Region." Regional Plan at 123.

The Plan continues with a discussion of the increase in use of cellular technology:

> "Use of cellular phones in day-to-day activities has skyrocketed over the past decade. The availability of broadband cellular data has increased the use of cellular phones to the point that they are essential to businesses and individuals alike. In fact, most U.S. households no longer have a "landline" phone. The lack of cell coverage is a major deterrent to both attracting businesses and younger families.
>
> Cellular access is determined in great part by topography in relation to the placement of cellular transmission towers. While coverage in the TRO Region is reasonably good along main travel corridors, it is spotty in more rural areas. In some instances, there are entire communities (such as Barnard) that have virtually no cellular access. In most cases, residents support improved cell phone access, but are less supportive of having the necessary facilities located in their communities. When residents object to proposed facilities, it is almost always due to the potential for aesthetic impacts." Id. at 124.

The Regional Plan continues with the following goal with respect to cellular telecommunications "Universal availability of mobile cellular service is available throughout developed areas in the TRO Region." Id. at 130. The Regional Plan then proceeds to note policies for achieving this goal, many of which mirror those of the Town Plan, emphasizing development outside of floodways, wetlands, or rare threatened and endangered species habitat, and designing sites to minimize and mitigate adverse impacts on historic sites, scenic viewsheds and wildlife habitat. Id. at 130. The Regional Plans policies also include designing facilities to the minimum height necessary to achieve coverage, while incorporating reasonable options for sharing space on the proposed tower. Id. at 130-131.

As discussed in the responses to the Town Plan, the project has been designed to minimize or

mitigate adverse impacts on natural resources, historic resources, and aesthetics. The tower is designed at the minimum height necessary to achieve coverage goals, but still provides the opportunity for other carriers to co-locate in the future, reducing the risk of a proliferation of towers in the Town of Rochester.

This Project fulfills the goals of the Town and Regional Plans by preserving and enhancing Verizon's ability to provide service in the affected parts of Rochester thus enabling the telecommunications infrastructure necessary for businesses and home offices to succeed in the global economy. This service also allows for telecommuting. The Project will continue to provide for enhanced communications for residents, travelers, educational institutions and emergency responders.

17. The Petitioner has neither applied for, obtained, nor been denied a permit or permit amendments under applicable provisions of Title 24 or chapter 151 of Title 10 for the proposed improvements covered by the current application or substantially similar improvements.

18. There are no known permit conditions that would impact the proposed improvements.

19. The Project will promote the general good of the State by improving wireless telecommunication infrastructure to increase capacity and support state-of-the-art wireless services in the community; improving high speed data services; providing competitive choices for consumers; and providing the opportunity to improve economic development within the State – all in conformance with the substantive criteria under 30 V.S.A. § 248a.

20. Concurrently with the filing of this Application, Verizon has provided a copy of this Application, with accompanying exhibits and testimony, to the Planning Commission and Select Board of the Town of Rochester, the Two Rivers-Ottauquechee Regional Planning Commission, the Agency of Natural Resources, Division of Historic Preservation, Commissioner of the

Department of Public Service and its Director for Public Advocacy and the Secretary of the Agency of Transportation. A notice of the filing of this Application has also been provided to the landowner of record of the property on which the facility is located and the landowners of properties adjoining the Project site.

21. In support of this Application, the Applicants submit the Prefiled Testimony and exhibits sponsored by the following witnesses:

Witness	Subject
Martin Lavin, RF Engineer	Description of the installation and the Project's purpose and impact on the existing Verizon network.
Scott N. Adams, P.E.	Description of proposed Project, impacts on historic resources, impacts on scenic beauty and existing permits.

NOTICE TO RECIPIENTS

Pursuant to the Public Utility Commission's ("Commission") *Order Adopting Revised Standards and Procedures Implementing 30 V.S.A. § 248a,* issued by the Commission on January 18, 2023 ("Procedures Order"), any and all recipients of this application will have 30 days to file comments, motions to intervene, or requests for hearing on the project with the Commission. If a recipient would like to request a hearing, the recipient must make a showing that the project raises a significant issue with respect to the applicable criteria under 30 V.S.A. § 248a(c)(1) and pursuant to the Procedures Order.

WHEREFORE, Applicant respectfully requests that the Commission:

1. Find that the Application complies with all applicable notice requirements set out in 30 V.S.A. § 248a(e) and (j);

2. Find that the Application meets the requirements set out in 30 V.S.A. § 248a(b)(4)(A), and, therefore, qualifies as one of "limited size and scope";

3. Find that the Project will promote the general good of the State of Vermont and authorize Applicant to undertake the actions as described herein and in its exhibits;

4. Issue an Order and Certificate of Public Good; and

5. Take such other measures as may be required for the expeditious review and approval of this Application.

Dated in Burlington, Vermont this 24th day of November , 2025.

Vertex Towers, LLC and Bell Atlantic Mobile Systems, LLC, d/b/a Verizon Wireless

By: _____

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