

**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 )

**DECLARATION OF TIM PARKS IN SUPPORT OF PETITIONER’S MOTION FOR  
SUMMARY JUDGMENT**

NOW COMES, Tim Parks, who states as follows:

1. My name is Tim Parks, I work for Bell Atlantic Mobile Systems, LLC d/b/a Verizon Wireless (“Verizon”) as a senior real estate specialist with a focus on wireless facility site acquisition and development.
2. Verizon’s goal is improve wireless telecommunication infrastructure to increase capacity and support state-of-the-art wireless services in the State of Vermont, improve high speed data services, provide competitive choices for consumers and to improve economic development within the state.
3. There is currently a gap in coverage provided by Verizon’s network in Manchester, Vermont, including the area in and around the following: Route 7A (Main Street) from Manchester Center north into Dorset, Hunter Park, Thompson Park, Manchester Town Hall and Public Safety Complex, Manchester Center, and the surrounding roads, neighborhoods, businesses, and shopping areas.
4. In order to address this gap in coverage and ensure that Vermonter’s have access to telecommunications services consistent with the State of Vermont’s objectives, Verizon

evaluated potential sites for wireless telecommunication facilities in and around Manchester, Vermont.

5. This included a review to identify any existing “tall” structure with the height and structural integrity that could host the proposed facility and support the requisite antenna, and also meet the coverage objectives. No such structures were identified.
6. Verizon, with assistance from C-Squared Systems, also undertook a detailed review of existing telecommunications facilities within a 10-mile radius of the proposed site to determine if co-locating on an existing facility would be a viable solution to the coverage gap.
7. The existing facilities in the area as shown on Exhibit ML-3, were all rejected. Co-location on those towers was either not possible, as Verizon is already installed on the tower (see the closest facility #3 on ML-3), or with co-location the coverage objectives would not be met as the sites are located too far away from the existing gaps in coverage (See Prefiled testimony of Martin Lavin at Page 3).
8. In order to fill the gaps in coverage following co-location, the Petitioner would have to proliferate additional towers and/or additional facilities – the very thing all parties want to avoid.
9. Therefore, in conjunction with Vertex Tower, LLC, Verizon identified 410 Hunter Park Road (the “Site), as a viable site for the location of a telecommunications facility, which was both available to the Petitioners and would enable Verizon to meet its coverage goals.
10. The Petitioner initially proposed a 140’ above ground level monopole tower at this Site. *See 24-0097-PET.*

11. Following feedback received from the Town of Manchester, the Petitioner revised the proposed tower design, changing the design to a monopole disguised as an artificial pine tree (“Monopine”).

12. In addition, the Petitioner reduced the height of the proposed Monopine to 130’ above ground level, which is the minimum height necessary for Verizon to meet its coverage objectives at the Site.

**Tim Parks hereby states as follows pursuant to Commission Rule 2.213(C)(5):**

1. The information in my Declaration and all exhibits sponsored therein are true and accurate to the best of my personal knowledge and belief.
2. I have personal knowledge of and am able to testify as to the validity of the information contained in my Declaration and all exhibits sponsored therein.
3. I understand I will be subject to sanctions for contempt and perjury if any statements are false.

Dated: 12/15/2025

DocuSigned by:  
*Tim Parks*  
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**Tim Parks**