

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

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

Case No. 24-3345-PET

**PETITIONER'S RESPONSE TO TOWN OF MANCHESTERS FIRST SET OF
DISCOVERY REQUESTS**

NOW COMES Bell Atlantic Mobile Systems, LLC d/b/a Verizon Wireless (“VZW”) and Vertex Towers, LLC (“Vertex”) (together, “Petitioner” or “Verizon”), by and through counsel MSK Attorneys, and hereby responds to the Town of Manchester’s (the “Town”) First Set of Discovery Requests. Petitioner reserves the right to amend, supplement or otherwise serve additional written discovery as the facts of this matter are discovered.

PRELIMINARY STATEMENT

The foregoing responses of Petitioner are based upon information now known. Petitioner has not yet completed its investigation of the facts pertaining to this matter and has not yet completed discovery or preparation for hearing and, therefore, reserves the right to amend, modify or supplement the objections or answers stated herein.

In providing these responses Petitioner does not in any way waive or intend to waive, but rather intends to preserve and is preserving:

a. all objections as to competency, relevancy, materiality, and admissibility as evidence of the information and documents produced in response to these requests;

b. the right to object to the use of any of the responses herein or documents produced in response to these requests at the hearing on this matter on any ground;

c. the right to object on any ground at any time to a demand for further responses to these requests or any other discovery procedures involving or relating to the subject matter of these requests responded to herein;

d. the right at any time to revise, correct, supplement or clarify any of the responses contained herein;

f. all objections as to vagueness and ambiguity; and

g. the right to make additional objections as may be deemed appropriate upon further review of information or documents.

Petitioner construes each request herein so as not to seek the identification or contents of, and states that no privilege log is required for, (a) the work product of Petitioner's counsel including but not limited to legal memoranda, drafts of pleadings, attorney notes, letters and other documents created by Petitioner's counsel, or (b) documents or information exchanged between or among Petitioner and their counsel, and other such documents and communications that have come into existence because of this litigation.

GENERAL OBJECTIONS

Each request is responded to subject to the General Objections set forth herein. The General Objections are part of the response to each request, including each and every amendment, supplement, or modification to any response as may be made subsequently, and are set forth here to avoid duplication and repetition.

1. Petitioner objects to the extent the requests are vague, overbroad, unduly burdensome, harassing and vexatious.

2. Petitioner objects to the extent any request seeks documents or information that is neither relevant to the subject matter of this litigation, nor reasonably calculated to lead to the discovery of admissible evidence.

3. Petitioner objects to the extent any request seeks documents prepared by Petitioner or its counsel in anticipation of, or in connection with, this litigation.

4. Petitioner objects to the extent any request seeks documents or information protected from disclosure by the Attorney-Client privilege, the Attorney Work-Product doctrine, or any other rule of privilege, protection or confidentiality. To the extent any information or document properly subject to privilege or other protection from disclosure is inadvertently produced in response, such production is not to be construed as a waiver of such privilege or protection.

5. Petitioner objects to the extent any request seeks disclosure of opinions, mental impressions, conclusions or legal theories of Petitioner, their counsel or other representatives.

6. Petitioner objects to the extent any request contains terms or phrases that are undefined and are, therefore, vague, ambiguous, and capable of various interpretations.

7. Petitioner objects to the extent any request seeks to impose burdens or obligations not contemplated by the Vermont Rules of Civil Procedure or as applicable the Rules of Procedure promulgated by this Commission, or seeks to alter or expand Petitioner' obligations thereunder.

8. Petitioner objects to the definition of the term "documents" on the grounds that it is overly broad and unlikely to lead to the discovery of admissible evidence.

INTERROGATORIES:

Q. Town: Petitioner. 1-1: Please set forth in detail each and every basis for Petitioner's assertion the proposed Facility complies with the Manchester Town Plan.

RESPONSE: Petitioner directs the Town to the Pre-filed Testimony of Daniel

Hamm at p. 5-8, wherein Hamm stated:

Conformance with Local and Regional Plans - 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 Manchester Town Plan (adopted on May 9, 2017) ("Town Plan"; excerpts attached as Exhibit DH-4) and the Bennington County Regional Plan amended as of March 23, 2017 (the "Regional Plan"; excerpts attached as Exhibit DH-5) to illustrate that the proposed Project will comply.

The Town Plan contains a Policy section devoted to “infrastructure,” which states in pertinent part:

Appropriate infrastructure must be in place to serve the needs of the community and employers. More than just water, sewer, and power, this includes fiber optics, access to high-speed, wide-bandwidth telecommunications facilities, and other types of technological capacity. Broadband access throughout Manchester is as essential as electricity in allowing citizens, employers, and home businesses to thrive and participate in community and commerce.

Id. at 4.

The Town Plan also contains a section entitled, “Power and Telecommunications Facilities.” Id. at 37. That section states, in pertinent part:

with regard to wireless telecommunications facilities, the Manchester Land Use & Development Ordinance requires conditional use review of all proposed development and siting of towers and related infrastructure. Visual impacts, lighting, noise generation, natural resource impacts, and site screening are all required to be carefully considered by the Development Review Board prior to approval of any new facilities.

Id. at 38.

While the zoning regulations are preempted by PUC law, Petitioner has done everything in its power to meet the objectives of the Manchester Zoning Regulations. It understands that the Town Zoning Regulations for the MU2 district do not provide that towers are an allowed use. However, there is no other parcel that meets the coverage objectives which is available to Petitioner on a commercially reasonable basis. Despite

its best efforts, the only parcel that was available to meet the coverage objectives was the one chosen.

The Project meets these stated objectives by proposing a monopine tower of the general height described. Petitioner's project provides coverage in an underserved area, and is sized so as to cut down on the proliferation of towers. The Project will enhance the quality of the Verizon's infrastructure serving Manchester in a manner that will maintain and improve the reliability of the Verizon network and internet connectivity and speed on that network. Verizon shares the goals of the Town Plan of using existing infrastructure rather than building new towers where feasible. However, in this case, there is no existing infrastructure that will allow Verizon to accomplish its objectives of enhancing coverage and capacity in this area. The location that Verizon has chosen is well developed and is not in an ecologically sensitive area. There will be little disruption of viewsheds. Further, this was the only parcel available to Petitioner on a commercial reasonable and viable basis which met the coverage objectives. Further, Verizon has scaled the Project down to the lowest height it can so as to reduce visual impacts and yet still meet the coverage goals of the State and Town Plan.

In addition to the above, Petitioner directs the Town to its Consolidated Response to the Public Utility Commission's Request for a Response to Comments at p. 5-12, wherein Petitioners stated:

Contrary to the statements of the Town, the proposed Facility does comply with the Town Plan. Section 1.1 of the Town Plan regarding Economic Development states that its mission is to "[c]reate a vibrant economic environment that encourages people to both live and work in Manchester." Moreover the Town's Northshire Economic Development Strategy (NEDS) report which is discussed in the Town Plan identified several goals to support this mission:

- (1) Improve the economic development environment,
- (2) Cultivate tourism, food, arts and culture industries,

- (3) Support entrepreneurship and business development, and**
- (4) Enhance the quality of life for residents and workers.**

The proposed Facility will enhance wireless telecommunications coverage in the Town for both customers of Verizon as well as customers of other telecommunications carriers who will co-locate on the proposed Facility in the future. Enhancing wireless telecommunications coverage in the Town is desirable to the public convenience for personal use of wireless services and for community safety in times of public crisis and natural disaster. Wireless telecommunications service also provides a convenience to residents and is an attractive feature and service to businesses. The proposed Facility will preserve and increase the amenities of the Town by enhancing telecommunications services for the tourism, food, arts and culture industries, and will also facilitate the adequate provision of transportation by improving mobile telecommunications for business, personal and emergency uses.

Wireless service is important to public safety and convenience. As of the end of 2021 there were an estimated 457 million mobile wireless subscribers in the United States. *See FCC's 2022 Communications Marketplace Report*, p. 56 (December 31, 2022). There are now more wireless subscriptions than landline telephone subscriptions in the United States, and the number of landline telephone subscribers across the nation is declining each year while the number of wireless users increases. Moreover, it is forecasted that wireless connections will become more significant as network service providers facilitate increased connectivity directly between devices, sensors, monitors, etc., and their networks. *Id. at 56-57.*

For many Americans, wireless devices have become an indispensable replacement for traditional landline telephones. Even when Americans maintain both types of telephone service, Americans are opting increasingly to use wireless devices in place of their landline telephones. For Americans living in "wireless-only" homes and for those others while away from their homes, cell phones are often their only lifeline in emergencies. Over 98% of Americans now own a cellphone of some kind, and more than 91% own smartphones and 15% of adults are "smartphone-only" internet users – meaning they own a smartphone, but do not have traditional home broadband service. <http://www.pewinternet.org/fact-sheet/mobile/> More importantly, more than 76% percent of American adults live in wireless only households for voice connectivity, and 80% of the estimated 240 million 911 calls made annually in the U.S. are placed are made from wireless devices. <https://www.ctia.org/the-wireless-industry/infographics-library>. To improve the effectiveness and reliability of wireless 911 services, the FCC's Phase II wireless enhanced 911 (E911) rules require wireless service providers to transmit the location of a wireless 911 call within very strict accuracy requirements. <https://www.fcc.gov/general/enhanced-9-1-1-wireless-services>

Section 3.3 of the Town Plan regarding Power and Telecommunication Facilities states the following mission: "Manchester recognizes the importance of efficient and

functioning electrical power and telecommunications facilities, and will work with utility providers to ensure that siting of facilities is accomplished in a manner that protects the scenic, cultural and natural resources of the town.” The Town Plan further specifies that:

In order to enhance aesthetics and visual character of the downtown area, public utilities (including ... telecommunications facilities) should be relocated from public view along main streets wherever possible. This may include behind buildings, away from the street, along streets, or underground. Where this is not possible, these should be screened from adjacent properties with dense coniferous plantings. Town Plan Section 3.3, pp. 38 (emphasis added)

As is shown by Prefiled Direct Testimony of David Archambault and accompanying photos from the Visibility Demonstration and photo simulations showing the proposed Facility (Exhibit DA-2), the proposed Facility will have minimal visual impact. Moreover, Petitioners have agreed to mitigate the minimal visual impact of the proposed Facility by camouflaging the tower as a “monopine” style tower with tree branches hiding the mounting platforms, brown antenna “socks” and a brown Corten steel “trunk”.

The most visible location of the proposed Facility (photo location 1) is taken at the driveway on the landowner’s property (who has not only consented to the proposed Facility, but has entered into a lease agreement with Vertex to locate the proposed Facility on its property). Photo location 2 is also on the same landowner’s property, but visibility is even more muted by the proposed monopine design which will blend in with the existing vegetation. There is only minimal and distant visibility from photo locations 6, 12 and 26, each showing the proposed Facility against a vegetated backdrop and not above the distant ridgeline. The remainder of the photos clearly show that the location of the proposed Facility and the substantial existing vegetative buffer and area topography effectively screens the proposed Facility from nearby main roads as well as downtown Manchester.

As sited, the proposed Facility will be (i) approximately .33 miles from the nearest portions Routes 7A (Main Street) and Route 30 (Bonnet Street) and minimally visible from these roads generally, (ii) behind a very large building (ice rink) and screened from adjacent properties with dense coniferous plantings and (iii) more than 1 mile (and not visible from) the intersection of Routes 7A and 30. *See* Exhibit DA-2, Page 2. The proposed Facility has been designed and sited in a manner that protects the scenic, cultural and natural resources of the Town in accordance with the Town Plan.

With respect to location of telecommunications towers, the Town Zoning Ordinance [FN 3: Because the proposed Facility is subject to the jurisdiction of the PUC under 30 V.S.A. § 248a., it is not regulated by the Town’s Zoning Ordinance: “No permit shall be required for a wireless telecommunication facility that is subject to or has received a Certificate of Public Good under 30 VSA §248(a).” Town Zoning

Ordinance Section 7.1.1. However, because the Town raised issues with respect to compliance with the Town’s Zoning Ordinance, Petitioners have responded herein.] provides that

7.1.7 Location

Telecommunications towers and associated equipment, buildings, and infrastructure shall not be located:

- (1) On undevelopable land;**
- (2) In historic districts as defined in this ordinance;**
- (3) In residential zoning districts as defined in this ordinance;**
- (4) Within 300 feet of any residence, residential zoning district or school; or**
- (5) Within the approach or departure routes or patterns of an approved airstrip.’**

As designed, the proposed Facility:

- will BE on land previously developed (and also immediately adjacent to a previously approved large solar panel installation as well as a very large industrial sand and gravel facility;**
- will NOT be in or anywhere near a historic district;**
- will BE in the MU2 (Mixed Use 2) Zoning District, which encourages the development of public infrastructure and light industrial uses (and will be immediately adjacent to the OI (Office Industrial) Zoning District [FN 4: The Table of Uses in the Town’s Zoning Ordinance PERMITS Communication Antennas in the MU2 Zoning District, but restricts Communication Towers to only the OI (Office Industrial), RA (Rural Agricultural) and FC (Forest Conservation) Zoning Districts.];**
- will NOT be within 300 feet of any residence, residential zoning district or school; and**
- will NOT be within the approach or departure routes or patterns of an approved airstrip.**

The nearest residence to the proposed Facility is over 900 feet away, the nearest residential zoning district is over 1,800 feet away, and the nearest school is over 1,100 feet from the proposed Facility, all more than 3 times the applicable setbacks set forth in the Town’s Zoning Ordinance. [See Map showing aerial view of 300 and 900 foot radius around Proposed Location at Id. page 10]

Moreover, although a Communications Tower is a permitted use in the OI Zoning District (subject to a Conditional Use Permit from the Town Development Review Board), location of a tower in the nearby OI district would be much closer and much more visible from Main Street and Bonnet Street due to previous vegetation removal, and would also much closer to nearby residential uses and the R1 (Residential 1) and RR (Rural Residential) Zoning Districts. [See Segment of Manchester Zoning District Map at Id. page 11]

Accordingly, although the proposed Facility is not regulated by the Town’s Zoning Ordinance, the proposed Facility has been designed and sited to address the purpose

and intent as well as the specific requirements and restrictions of the Town Zoning Ordinance as much as possible.

Q. Town: Petitioner. 1-2: Please describe in detail Petitioner's efforts to find a suitable alternative site for the proposed Facility.

RESPONSE: The Petitioner states that, through the work of Matt Burke of MBMC, LLC experienced wireless facility site acquisition professionals, it undertook a detailed review of existing telecommunications facilities a within a 10-mile radius of the site. As to the existing facilities in the area as shown Exhibit ML-3, they were all rejected. Co-location on those towers was either not possible, as Petitioner 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 pp 3, also see DPS response to Petitioner's Consolidated Response*). In order to fill those gaps, Petitioner would have to proliferate additional towers and/or additional facilities – the very thing all parties want to avoid.

Petitioner also evaluated many other properties in the area surrounding the proposed site under a general framework based on 1) whether the site could provide coverage to meet the coverage goals of Petitioner, 2) whether a tower could feasibly and reasonably be constructed on the site or where there environmental and spatial limitations about the site that made construction unreasonable, and 3) whether the site and/or landowner was available to Petitioner. All of these other properties were deemed unworkable because it didn't meet the coverage objective; because there were substantive title issues, wetlands or other conservation easements and/or environmental limitations (i.e ANR Habitat Blocks or wetlands) that would prevent or prohibit development of a tower

on the property; because a tower on the property would be substantially more visible because of existing clearing on the property or surrounding properties; and/or because the landowner was not responsive or not interested in leasing the property for a tower. After this exhaustive review, the only property that was available, suitable from an environmental standpoint, and with an owner willing to lease to Petitioner on a commercially viable basis, was the property proposed to be used by Petitioner.

Petitioner further directs the Town to Petitioner’s Exhibit ML-3 Existing Tower Analysis, Petitioner’s Consolidated Response to the Public Utility Commission’s Request for a Response to Comment at p. 1-5 and DPS’s Response to Petitioner’s Consolidated Response which also detail information responsive to this request.

Q. Town: Petitioner. 1-3: Please list each and every potential alternative site considered by Petitioner as a site for the proposed Facility.

RESPONSE: The Petitioner considered all existing telecommunications facilities within a 10-mile radius of the site. See response to Question 1-2 above. The Petitioner considered the following properties (as also shown on map VT-VT-0056 produced hereto) in the area of the site as a potential alternative site for the proposed Facility:

ID	Address	Parcel ID	Distance from Proposed Location	Comments
A	46 HUNTER PARK Rd	16-20-07.00	0.28	Landlord was not interested in leasing space for a tower.
B	C PIG PEN Rd	15-20-04.06	0.08	Subject Property Owner, Deed restricted.
C	A RECREATION PARK Rd	15-20-23.00	0.08	Large swath of Wetlands on the Parcel, unable to access to build site.
D	752 BONNET St	15-20-20.01	0.23	Large swath of Wetlands on the Parcel, any other part of the parcel would be extremely visible to the neighborhoods to the west and south..
E	5940 MAIN St	16-20-30.00	0.41	Landlord was not interested in leasing space for a tower. Any tower location on parcel would be extremely visible to the neighborhoods to the north and east.

F	D BONNET St	15-20-27.00	0.48	Property is lower in elevations and does not provide needed coverage to the east.
G	46 N ROAD	16-20-02.00	0.38	Landlord was not interested in leasing space for a tower, and parcel is listed as Hazardous Site.
H	98 OVERLOOK Rd	16-20-01.01	0.56	Landlord was not interested in leasing space for a tower. Parcel has large swath of ANR Habitat Blocks and Wetlands. Any buildable location would be extremely visible.
I	15 WINDHILL Rd	11-20-11.00	1.15	Landlord was unable to lease space on property for a tower due to title issues. Parcel has large swath of ANR Habitat Blocks. Any buildable location would be extremely visible.
J	1319 BONNET St	15-20-04.00	0.75	Parcel has large swath of ANR Habitat Blocks & Rare Threatened and Endangered Species Areas
K	2508 WEST Rd	15-20-02.00	0.93	Landlord was not interested in leasing space for a tower. Parcel has large swath of ANR Habitat Blocks and Wetlands. Any buildable location would be extremely visible.
L	2144 WEST Rd	15-20-13.00	0.66	Landlord was not interested in leasing space for a tower. Parcel has large swath of ANR Habitat Blocks and Wetlands. Unable to locate buildable area on parcel..
M	2873 WEST Rd	10-20-28.00	1.72	Conservation Easement
N	2808 MORSE HILL Rd	10-00-81	2.53	Landlord was not interested in leasing space for a tower. Parcel has large swath of ANR Habitat Blocks. Parcel is too close to existing tower location, would cause redundant coverage..
Blue Area				Conservation Easement
Green Area				Large swath of parcels containing ANR Habitat Blocks, Deer Wintering Area, & Rare Threatened and Endangered Species
Teal Area				Large swath of Wetlands Area
Purple Area				Large swath of parcels containing ANR Habitat Blocks, Significant Natural Communities, & Rare Threatened and Endangered Species

Q. Town: Petitioner. 1-4: Please explain why each potential alternative site listed in response to

RESPONSE: See response to Question 1-4 above.

Q. Town: Petitioner. 1-5: Please describe in detail the efforts Petitioner has made to locate the proposed Facility within existing tall structures.

RESPONSE: Petitioner engaged Matt Burke of MBMC, LLC, experienced site acquisition professionals, 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, and none were identified.

Q. Town: Petitioner. 1-6: Please describe in detail the efforts Petitioner has made to co-locate with an existing communications tower.

RESPONSE: The Petitioner looked at all available existing telecommunications towers within a 10 mile radius to determine if co-location was feasible. Based on this review, there are no existing communications towers which Petitioner could co-locate on and meet its coverage goals in the Town of Manchester. As noted, Petitioner is already installed on the nearest existing facility and that does not provide adequate coverage to the proposed coverage area. Further information, including the DPS determination that co-location was not feasible is found in Petitioner's Consolidated Response to the Public Utility Commission's Request for a Response to Comment at p. 1-5 and the DPS's Response to Petitioner's Consolidated Response.

Requests to Produce

Q. Town: Petitioner. 1-7: Please produce all non-privileged Documents that relate to Petitioner's efforts to identify an alternative site for the proposed Facility.

RESPONSE: Petitioner will produce and is collecting the relevant, non-privileged documents reflecting Petitioner's efforts to review alternative sites. Petitioner does object to the extent that Petitioner does not believe that 30 V.S.A. 248a standards applicable to this application require that Petitioner establish that it exhausted every possible property in the Town of Manchester, or that there exists no other *possible* property where a tower could be located. Petitioner conducted a reasonable alternatives analysis and determined that co-location was not possible and that the proposed site was suitable, available, and would allow it to meet coverage goals.

Q. Town: Petitioner. 1-8: Please produce all non-privileged Documents that relate to Petitioner's efforts to co-locate with an existing communications tower.

RESPONSE: Petitioner will produce and is collecting the relevant, non-privileged documents reflecting Petitioner's evaluation of co-location options. As reflected in the DPS comments, co-location is not an option to meet these coverage objectives.

Requests to Admit

Q. Town: Petitioner. 1-9: Admit that the site for the proposed Facility is in the MU2 Zoning District in Manchester.

RESPONSE: Admit.

Q: Town: Petitioner. 1-10: Admit that the proposed Facility as described in the Petition would be visible from various locations along the recreation paths within the Dana Thompson Memorial Park, in Manchester, Vermont.

RESPONSE: Admit. The tower is designed as a "monopine" camouflaged as an artificial tree. The monopine would be visible from various locations to the extent that it can be distinguished from the existing trees located at the site. The extent of such visibility would vary widely depending on the specific location one is standing on said recreation path, the ambient light, the season, the cloud cover, the tree cover, and other environmental factors.

Q: Town: Petitioner. 1-11: Admit that the proposed Facility as described in the Petition would be visible from various locations along the recreation paths within Hunter Park in Manchester, Vermont.

RESPONSE: Admit. See Response to Q. 1-10 with respect to the mitigating effect of the camouflaged monopine design. The extent of such visibility would vary widely

depending on the specific location one is standing on said recreation path, the ambient light, the season, the cloud cover, the tree cover, and other environmental factors.

Q: Town: Petitioner. 1-12: Admit that the proposed Facility as described in the Petition would be visible from various locations on the Riley Rink property in Manchester, Vermont.

RESPONSE: Admit. See Response to Q. 1-10 with respect to the mitigating effect of the camouflaged monopine design. The extent of such visibility would vary widely depending on the specific location one is standing on said property, the ambient light, the season, the cloud cover, the tree cover, and other environmental factors.

Q: Town: Petitioner. 1-13: Admit that the proposed Facility as described in the Petition would be visible from portions of Main Street in Manchester, Vermont.

RESPONSE: Admit the proposed Facility as described in the Petition would be visible from some portions of Main Street in Manchester, Vermont. Denied that those portions include the southernmost section of Main Street, sometimes referred to as Historic Main Street or the majority of the road. Further as noted above, visibility varies wildly depending on where one is standing, the ambient light, the season, the cloud cover, the tree cover, and other environmental factors.

Q: Town: Petitioner. 1-14: Admit that the proposed Facility as described in the Petition would be visible from portions of Bonnet Street in Manchester, Vermont.

RESPONSE: Admit the proposed Facility as described in the Petition would be visible from portions of Bonnet Street in Manchester, Vermont. Denied that those portions include the southernmost section of Bonnet Street or the majority of the road. Further as noted above, visibility varies wildly depending on where one is standing, the ambient light, the season, the cloud cover, the tree cover, and other environmental factors.

AS TO OBJECITONS:

DATED at Burlington, Vermont this 31st Day of July, 2025.

MSK ATTORNEYS

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Verification AS TO FACTS within my knowledge, information and belief based on information
now know:

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By: Tim Parks
Tim Parks (Jul 31, 2025 10:01:43 EDT)
Name: Tim Parks
Title: Senior Real Estate Specialist

Vertex Towers, LLC

By: Stephen Kelleher
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