

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 25-1679-PET

Application of	)
Industrial Tower and Wireless, LLC	)
for a Certificate of Public Good,	)
pursuant to 30 V.S.A. § 248a, authorizing	)
the construction of a wireless telecommunications	)
facility in Tinmouth, Vermont.	)

**SUPPLEMENTAL PREFILED DIRECT TESTIMONY OF KEVIN DELANEY
ON BEHALF OF INDUSTRIAL TOWER AND WIRELESS, LLC**

April 3, 2026

Summary:

This supplemental pre-filed testimony documents a lowering of the proposed tower height from 160' AGL to 130' AGL.

Q1. Please state your name, employer and current position.

A1. My name is Kevin Delaney, and I am the Vice President of Site Acquisition and Development and a Radio Frequency (“RF”) Engineering & Regulatory Compliance Manager currently working for Industrial Tower and Wireless, LLC (“ITW”) in Marshfield, Massachusetts. ITW and affiliate companies, including Industrial Communications, LLC, Industrial Communications and Electronics, Inc., and Industrial Wireless Technologies, Inc. (together “ITW”) have been serving all aspects of the communications industry for over fifty (50) years.

Q2. Please state briefly your professional background and experience testifying before the PUC.

A2. Please see my prefiled testimony dated August 8, 2025 filed in the present case for responses to this question.

Q3. Please identify the location of the Project that is the subject to this § 248a filing.

A3. ITW intends to construct a telecommunications facility on a portion of the approximately 32.35-acre parcel of land owned by George Herrick and Paul Herrick on 402 VT Rt 140, Tinmouth, Vermont. ITW refers to the project as “Tinmouth.” The property owners have given ITW permission to proceed with this Application. The coordinates for the Project are latitude 43°27’00.05” North and longitude 73°02’24.05” West. *See* Permit Plans, Exhibit LH-1, for a visual depiction of the Project’s location.

Q4. Have there been any changes in the design of the Project?

A4: ITW has heard the “concerns” of the Town and undertook a review of its coverage areas. It feels it can provide the required dBm-W levels to fill its core service objectives, and fill a gap in coverage prevailing across all carriers, with a tower reduced to 130’ AGL. This

1 tower will look the same as the plans provided with the initial application but is lowered
2 to 130'. A revised plan set depicting the tower at 130' AGL (*see* Exhibit LH-1 - Permit
3 Plans (Revised)) and revised photo simulations showing the tower at 130' AGL (*see*
4 Exhibit LH-6 – Photosimulations (Revised)) have been filed concurrently herewith.

5 The reduction in tower height will reduce ITW's coverage and likely result in the
6 need to construct additional facilities. However, ITW feels it can still meet its immediate
7 coverage objectives and good of the state (filling in a gap in coverage overall) with a 130'
8 tower while attempting to mitigate some of the Town's concerns. The tower will still be
9 structurally capable of supporting co-location by two (2) other carriers to address gaps in
10 their coverage. Updated propagation plots for a 130' tower are attached hereto as Exhibit
11 KD-1- Propagation Plots (Revised).

12 This change will not have an impact on the Existing Tower Analysis and
13 Alternative Site Propagation Plots submitted as Exhibit KD-3.

14 Any reference in any prior testimony asserting the tower would be 160' AGL
15 should now be read to replace the 160' AGL with 130' AGL.

16 **Q5: Are there any other changes with the Project?**

17 **A5:** No. The project location, compound, access, screening, and natural resource impacts
18 remain the same. The only thing that has changed is the proposed height of the tower is
19 30' lower than previously proposed.

20 **Q6: Does this conclude your Supplemental Testimony?**

21 **A6.** Yes.

Exhibits to Prefiled Testimony of Kevin Delaney

Exhibit KD-1 Propagation Plots (Revised)