

**STATE OF VERMONT
PUBLIC UTILITY COMMISSION**

Case No. 26-0574-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 Enosburgh, Vermont.	)

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

May 13, 2026

Summary:

Mr. Delaney’s supplemental testimony provides additional information about whether any “existing wireless telecommunications facilities” within a 10 mile radius other than the existing towers previously discussed.

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

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

9 **Q2. Please state briefly your professional background.**

10 A2. For my professional background, please see my prefiled testimony dated March 18, 2026
11 and filed on March 27, 2026.

12 **Q3. Please identify all existing telecommunications facilities, *in addition to the towers***
13 **previously identified, within the area to be served by the Enosburgh site, and, for**
14 **each such existing facility, include a projection of the coverage that would be**
15 **provided if the Enosburgh site were located on or at the existing facility.**

16 A3. As I previously noted, the Route 108 corridor is a very difficult area to cover because it is
17 a narrow, winding road that runs between mountainous terrain. That topography presents
18 severe challenges with signal propagation. Wireless signals travel in straight lines and are
19 obstructed by elevation changes, especially when the transmitting tower is lower than
20 surrounding terrain. The propagation plots that I created for this site illustrate these
21 difficulties. See Exhibit KD-1.

22 In my initial pre-filed testimony, I stated that the existing facilities within the Town of
23 Enosburgh and the surrounding towns within a radius of ten (10) miles from the proposed

1 site do not provide adequate coverage to the area being served by this project. This
2 included both towers and existing facilities *other* than just towers. Given that these
3 facilities are all much lower than the two towers I discussed in more depth and provided
4 coverage maps for in Exhibit KD-3, I did not create separate propagation plots as there
5 would be no possibility of effective coverage from these sites.

6 At the request of the Department of Public Service, I have supplemented that analysis
7 with the additional non-tower facilities shown on KD-6 Supplemental Facility Analysis
8 and Propagation Maps and discussed below:

9 (i) A seventy-foot silo located at 3423 W. Enosburg Road, Enosburg Falls with PUC
10 approval for VTel to install 9 panel antennas (Docket No. 7947). A propagation
11 plot from this facility is shown on Exhibit KD-6 at Page 2. At 70 feet, with
12 existing antennas located on the silo, ITW could not reasonably place its
13 equipment at a height to provide coverage over large portions of the area to be
14 served by the proposed Tower. The propagation plot shows a significant reduction
15 in the area to be served, with resulting coverage limited to Route 108 south of
16 Enosburgh Falls and a limited area north of Enosburgh Falls. This would leave
17 large portions of the proposed coverage area without service and harm the public
18 good. As demonstrated by the pre-filed comments, including the Town of
19 Enosburg's municipal recommendation, there is a substantial need for taller
20 facilities that allow first-responder and emergency communications.

21 (ii) A seventy-foot silo located at 1292 Lawyer Road, Bakersfield, Vermont with
22 PUC approval for VTel to install 9 panel antennas (Docket 7919). A propagation
23 plot from this facility is shown on Exhibit KD-6 at Page 3. Again, given the low

1 height of this silo and existing equipment already installed on the facility, ITW
2 could not locate its equipment at a height to provide any meaningful coverage to
3 the area proposed to be served by ITW's proposed Tower. The propagation plot
4 shows that the distance from the site and intervening terrain substantially limits
5 coverage and such that there is a significant reduction in coverage. This location
6 would offer coverage along State Route 36, but would fail to provide meaningful
7 coverage to the Route 108 corridor. The Route 108 corridor was specifically
8 noted in the public comments as a location with limited existing coverage for
9 cellular providers.

10 (iii) An eighty-six foot silo located at 1376 Chester A. Arthur Rd in Fairfield,
11 Vermont with PUC approval for New Cingular Wireless to install three panel
12 antennas (Docket 19-4921-PET). A propagation plot from this facility is shown
13 on Exhibit KD-6 at Page 4. The distance from the proposed tower, low height of
14 the silo and intervening terrain means that this site cannot provide coverage to the
15 area proposed to be served by ITW's tower. Once again, this location would offer
16 coverage along State Route 36, but would fail to provide meaningful coverage to
17 the Route 108 corridor. The Route 108 corridor was specifically noted in the
18 public comments as a location with limited existing coverage for cellular
19 providers.

20 (iv) A seventy-eight foot church steeple located at 245 Church Street Enosburg,
21 Vermont with PUC approval for T-Mobile Northeast to install three panel
22 antennas. (Docket No. 25-0310-PET). This site almost adjacent to the 121 foot
23 monopole tower located at 398 Birch Lane, however it is forty-three feet lower

1 and thus provides substantially less coverage than was shown for the 121
2 monopole – which itself was minimal. A propagation plot from this facility is
3 shown on Exhibit KD-6 at Page 5. This location would offer coverage to
4 Enosburgh Falls, but it would be localized and would not provide meaningful
5 coverage to the Route 108 corridor, which as previously noted is a goal for this
6 project.

7 (v) An eighty-foot silo located at 10795 VT Route 105 in Sheldon, Vermont with
8 PUC approval VTel to install nine panel antennas. (Docket No. 7968) A
9 propagation plot from this facility is shown on Exhibit KD-6 at Page 6. The
10 distance from the proposed tower, low height of the silo and intervening terrain
11 means that this site cannot provide coverage to the area proposed to be served by
12 ITW's tower. This location would offer coverage to Enosburgh Falls, but it would
13 be localized and would not provide meaningful coverage to the Route 108
14 corridor, which as previously noted is a goal for this project.

15 (vi) A sixty-six foot silo located at 539 East Sheldon Road, Sheldon Vermont with
16 PUC approval for New Cingular Wireless to install three panel antennas (Docket
17 20-2767-PET). A propagation plot from this facility is shown on Exhibit KD-6 at
18 Page 7. Again, given the low facility height and intervening terrain, this facility
19 cannot provide coverage to the area to be served by ITW's tower. The resulting
20 coverage from the facility would be localized, only providing coverage over a
21 portion of 105 West of Enosburg, but would provide no coverage to the Route
22 108 corridor or the Town of Bakersfield.

23 **Q4. Does this conclude your Supplemental Direct Testimony?**

1 A4. Yes.

Exhibits to First Supplemental Prefiled Testimony of Kevin Delaney

Exhibit KD-6

Supplemental Existing Facilities Analysis and Coverage Maps