

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 telecommunications facility in Tinmouth, Vermont	
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TOWN OF TINMOUTH'S SECOND SET OF INFORMATION REQUESTS

Pursuant to PUC Rules 2.214 and 2.230, Town of Tinmouth, through counsel, DesMeules Olmstead & Ostler, hereby request that Petitioner Industrial Tower and Wireless, LLC answer the following interrogatories, requests to produce, and requests to admit, under oath, and produce copies of the documents described herein.

DEFINITIONS

The following definitions apply to the following discovery requests:

DEFINITIONS AND INSTRUCTIONS

1. The terms “You”, “Yours” or “Petitioner” or “Applicant” shall mean the applicant designated in the caption of this action, including their agents or representatives, if any.
2. The term “Petition” means the Petition filed in this action by the Applicant on July 29, 2025.
3. The term “Industrial Tower and Wireless, LLC” and “ITW” means the Applicant and/or Petitioner, including any officers, employees, or agents acting on its behalf.
4. These requests shall be deemed continuing and must be supplemented in accordance with PUC Rule 2.230(D). Petitioner is directed to change, supplement and correct its answers to conform to all information as it becomes available to Petitioner, including the substitution of actual data for estimated data. Responses to requests for information covering a period not

entirely in the past (or for which complete actual data are not yet available) should include all actual data available at that time and supplementary data as it becomes available. Wherever responses include estimated information, include an explanation (or reference to a previous explanation) of the methods and calculations used to derive the estimates.

5. The term “Project” or “Site” means the precise location of the tower, including the curtilage, which is the subject matter Petitioner’s application, and the “Premises” shall refer to the entire leased property there.

6. If you are asked to identify or state the identity of a person, you are to state his or her name, employer, job description or title, business address, business telephone number, and home address.

7. If you are asked to identify or state the identity of a document, you are to describe the document with particularity sufficient to require its production if such description were used to request production.

8. Where knowledge or information in the possession or control of Petitioner is requested or inquired of, such request or inquiry includes knowledge or information, possession or control of or by its agents, servants, representatives, and unless privileged, its attorneys.

9. Intervenors reserve the right to submit additional information requests to Petitioner.

10. If a claim of privilege is made with respect to an interrogatory or document request, a document or any part thereof, specify the exact ground or grounds of the privilege claimed and give sufficient particulars concerning the response or document to allow the PUC to rule on the claim, including the author, all recipients, date and subject matter of the document.

11. To the extent any interrogatory may be construed to call for either a narrow or comprehensive response, the comprehensive response should be provided. To the extent any

interrogatory may be construed to call for either a general or detailed response, the detailed response should be provided.

12. These interrogatories are to be deemed continuing, requiring Petitioner to further respond by verified supplemental answer setting forth any additional information within the scope of the interrogatories subsequent to each original answer.

13. The term “concerning” means, without limitation, relating to, referring to, describing, evidencing, computing, analyzing and constituting.

14. The term “communication” means any transfer or exchange between two or more persons or entities of any information in the form of facts, ideas, inquiries or otherwise including, but not limited to, personal conversations, correspondence, telephone calls, telegrams, telexes, telefaxes, texts, electronic mail, oral statements or other transmission.

15. The term “identify,” when used in reference to any person other than a natural person, means to state to the fullest extent possible the full name and present or last known address of the principal place of business of the corporation, partnership, proprietorship, association, or other organization to be identified.

16. As used in these discovery requests the term “documents” shall be defined in a comprehensive sense and means any kind of internal and/or external written, typewritten, hand-printed, electronic or recorded material whatsoever, including any records, papers, correspondences, emails, texts, or notes which relate in any manner to the subject matter of the litigation, and includes originals, drafts, and non-identical copies. “Writings” and “documents” shall be interchangeable.

17. All other terms are to be given their plain, ordinary meaning unless specifically directed otherwise hereinabove or below.

18. Pursuant to Rule 2.230(M), reproduce the request you are answering.
19. Pursuant to Rule 2.230(M)(3), each request must be answered under oath by a person competent to testify to the request, as well as all documents, tangible things, and exhibits produced in response to the request. Please state the name of each person responding to the request, the title of each person responding to the request, the department, unit, or division that maintains any records being produced and/or the data from which the answer is based, and the date the request was answered.
20. Where requested information is unavailable in the exact format requested, or the information is not available for the entire range requested in a series, please provide all available information that is responsive to the subject matter of the question.
21. Whenever and wherever responses include estimated information please include an explanation, or reference to a previous explanation, of the methodology and calculations used to derive the estimates.
22. If any request is objected to in whole or in part, please describe the complete legal and factual basis for the objection and respond to all parts of the interrogatory or request to the extent to which it is not objected. If an objection is made regarding any requested document(s), please identify the document by author, title, date, recipient(s), if any, and describe the nature and subject matter of the document(s), and provide a complete legal and factual basis for the objection.
23. The Town reserves its right to serve additional requests on Petitioner.

Q.TINMOUTH:PETITIONER.2.1: Indicate how many square miles of two-way radio coverage the proposed 130' tower will provide and indicate how much of this area (in terms of square miles) is not currently covered by other facilities.

Q.TINMOUTH.PETITIONER.2.2: In Petitioner’s responses to the Town’s first set of information requests, **Q.TINMOUTH.PETITIONER.1.16**, Petitioner indicated that reducing the proposed tower by 30’ “will reduce ITW coverage and likely lead the need [sic] to construct additional facilities.”

- a. Express that reduction as a percentage relative to the previously proposed 160’ tower.
- b. Express that reduction in square miles relative to the previously proposed 160’ tower.
- c. Express that reduction in terms of the number of ITW customers.
- d. Is ITW currently searching for another location in Tinnmouth for an additional proposed tower in light of its response to **Q.TINMOUTH.PETITIONER.1.16**?
- e. Admit that the ITW Tower in Ira, Vermont along Route 133 has no antennas affixed to it as of June 17, 2026. If denied, state in detail on what bases such request to admit is denied

Q.TINMOUTH.PETITIONER.2.3: What circumference, expressed in feet, does each red circle represent on Exhibit LH-6 (revised).

Q.TINMOUTH.PETITIONER.2.4: Admit that the Viewshed analysis in LH-6 (revised) was not updated to reflect the proposed 130’ lattice tower.

Q.TINMOUTH.PETITIONER.2.5: Admit that the photosimulations in LH-6 do not reflect a lattice tower with any colocator equipment affixed to the tower.

Dated at Norwich, Vermont this 17th day of June, 2026.

BY: DesMeules, Olmstead & Ostler

Signed: /s/ Andrew D. Cliburn
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