

STATE OF VERMONT
PUBLIC UTILITY COMMISSION

Case No. 22-2120-PET

Petition 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.)

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

May 26, 2023

Summary:

Mr. Delaney's second supplemental testimony will address describe how the services that ITW provides fit the definition of "interconnected mobile services" as that term is used in the federal Telecommunications Act of 1996.

1 Q1. Do you understand that you are still under the oath you took when you submitted
2 your Direct Prefiled Testimony and Supplemental Prefiled Testimony in this matter?

3 A1. Yes.

4 Q2. Has ITW been in contact with the St. Albans Police Department regarding the
5 proposed height of its antenna?

6 A2. Yes. Lt. Benjamin Couture gave the following response to in an email about the height at
7 which that Department wants to mount its antenna: “Yes, we would still like to have the
8 tower be at least 140 feet tall.” See attached Exhibit KD-10. St. Albans Police Chief
9 Maurice Lamothe previously stated his Department’s wish to have its antenna mounted at
10 the top of the tower. Exhibit KD-7.

11 Q3. Does this conclude your Third Supplemental Prefiled Testimony?

12 A3. Yes.

Exhibit to Third Supplemental Prefiled Testimony of Kevin Delaney

Exhibit KD-11 Email from Lt. Benjamin J. Couture