



Scott Olson, Esq.  
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RE: Barr Lane – Proposed Small Cell Facility to be Located at 40 ½ Barr Lane

Dear Scott;

This letter is provided in response to the Town of Monroe Zoning Board of Appeals' question as to why the Verizon Wireless has proposed a new utility pole structure instead of using the existing water tank structure for installation of its antennae. As you know, Verizon Wireless proposes to install and operate a new small cell facility at the above-referenced property, inclusive of a new 67' wooden utility pole with two antennae located at the top of such structure; all within a forty-eight (48) square foot lease area on the property.

I understand that the Verizon Wireless Radio Frequency Design Engineer has provided information describing the need for the facility at this location. This letter will focus on the reasons why use of the existing water tank structure is not preferred for use by Verizon Wireless from a construction and maintenance perspective.

First, a little historical perspective is appropriate. It is true that in the past Verizon Wireless has collocated its antennae and equipment on existing water tank structures. It is that experience that prompted Verizon Wireless to reconsider its use of water tank structures for future facilities, including the proposed small cell facility.

In summary and as described in greater detail below, Verizon Wireless has determined that collocating small wireless facilities, such as that proposed, are not preferred options of installation. In summary, installation of small wireless facilities on existing water tanks: (i) is not cost effective; (ii) creates certain access and maintenance issues that are inconsistent with Verizon Wireless' existing wireless network; and (iii) risk potential damage to the existing tank structure. For these reasons, collocation on existing water tank structures are not preferred by Verizon Wireless.

#### Collocation on Water Tanks are not Cost Effective

Use of small wireless facilities are intended to provide generally smaller coverage/capacity footprints while minimizing visual impacts and installation and operation costs (compared to traditional towers). To accomplish these goals, Verizon Wireless' typical small wireless facility design focuses on the use of standard (but slightly taller) wooden utility poles that are ubiquitous in many municipalities relative to the provision of traditional electrical and telephone service. This design was chosen for a purpose; to utilize utility structures that have been widely used and accepted over the last 100 years or so and to minimize the cost of deployment of these types of facilities.

The costs of installing a facility on the existing water tank is approximately three times the cost of that to install the same facility on a wooden utility pole, as proposed. This factor alone is a significant barrier to pursuing collocations on existing water tanks since it could triple the small wireless facility budget at the national level.

As set forth below, collocation on the existing water tank has the potential to substantially increase the installation costs even higher as a result of the likely need to temporarily relocate the facility during periods of scheduled maintenance.

#### Access and Maintenance Issues Concerning Water Tank Structures

Another significant issue involving the use of water tank structures involves the potential limited access to the tank during certain times when routine maintenance is being performed on the tank or related water system. One of the main reasons to avoid use of water tank structures is that at some point during the life of the small wireless facility, it will most likely have to be temporarily relocated to allow the tank owner to repaint and/or perform significant maintenance on the structure. This fact has proven to be extremely disruptive to the network, as well as being costly, since the cost of such temporary relocation is always the responsibility of the wireless carrier. Simply stated, there is no budget for the temporary relocation of small wireless facilities.

The disruption associated with a temporary relocation of an existing wireless facility is significant. It typically requires construction and radio frequency personnel to take time from their busy schedules to work with the local municipality to attempt to accommodate the municipality's maintenance schedule. This, in turn, results in a material reduction of resources that are typically dedicated to the continued development of the network. When magnified by other similar temporary relocation projects, the time commitment has a noticeable impact on network development and operation.

In addition to the substantial time commitment, there is a corresponding cost associated with establishing a temporary relocated site. This cost is a further hinderance to the use of existing water tank structures since it takes budget money away from network development, which translates to slower and/or reduced deployment of critical sites/infrastructure, thereby depriving the general public and emergency personnel of wireless service, especially during times of national emergencies such as is currently being experienced with the coronavirus.

#### Potential Damage to the Water Tank Structure

There are several different types of water tank structures in utilization today. Because of the different types of tanks, there are also several different installation methods used to secure wireless communications antennae and equipment to a tank based on the specific type of tank used. Without going into the specifics of the various tanks and installation methods, one thing stands out based on our experience with using water storage structures for wireless facilities, and, that is, no matter the installation method chosen, there is always an increased risk of damage to the tank. Regardless of the amount of caution and planning, the risk of damage to an existing tank is always present when it comes to using a structure that was not originally designed to accommodate other uses such as wireless antennae and equipment.

In situations where the installation of wireless antennae and equipment causes damage to the tank, the wireless carrier is responsible for take appropriate correct action, which could result in substantial

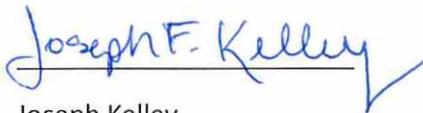
disruption to the existing municipal water system depending on how it was designed and the necessary corrective measures. So, not only does this have a potential to significantly increase the overall cost of the wireless facility, it can also result in complications to the municipality's water system, neither of which are preferred.

#### Conclusion

Based on the foregoing and after examination of its historical use of water tank structures for its wireless communications needs, Verizon Wireless has made a conscience decision to avoid installing its antennae and equipment on existing water tank structures. The use of such structures is simply not cost effect. The installation cost alone associated with using the water tank in this specific instance alone is approximately triple the cost of that associated with the installation of a simple wooden utility pole structure as originally proposed. That cost only increases once you factor in the likelihood that at some point during the "life" of the small wireless facility it will need to be relocated to accommodate a major maintenance or repainting of the tank and the possible need to repair damage to a structure that was never designed to accommodate such use in the first place. Additionally, the access and maintenance limitations place further unwanted burdens on Verizon Wireless and its network that are not present with a simple wooden utility pole structure.

Please let me know if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Joseph F. Kelley". The signature is written in a cursive style with a long, sweeping tail on the letter "y".

Joseph Kelley

Implementation Manager