



445 Hamilton Avenue, 14th Floor  
White Plains, New York 10601  
T 914 761 1300  
F 914 761 5372  
cuddyfeder.com

Kristen Motel  
[kmotel@cuddyfeder.com](mailto:kmotel@cuddyfeder.com)

October 26, 2021

BY ELECTRONIC DELIVERY

Chair Josye Utick and Members of the Planning & Zoning Commission  
City of Hartford  
Planning and Zoning Division  
Department of Development Services  
260 Constitution Plaza  
Hartford, CT 06103

Re: Supplemental Materials  
Proposed Zoning Text Amendment & Special Permit Applications  
5G Small Cell Facilities  
Sections 4.20.7.F(1) & (3) of the Zoning Regulations

Dear Chair Utick and Members of the Planning & Zoning Commission:

On behalf of New Cingular Wireless PCS, LLC ("AT&T" or the "Applicant"), we respectfully submit this letter and the enclosed supplemental materials in furtherance of the proposed text amendment to modify Sections 4.20.7.F(1) & (3) of the Zoning Regulations and batched special use permit applications to install Small Cell Nodes ("Small Cells") on City-owned infrastructure at seven (7) locations.

As requested by Planning and Zoning Commission members during the October 12, 2021 public hearing, we are enclosing letters of support for the proposed minor zoning text amendment from T-Mobile Northeast, LLC and CTIA, a national trade association representing the wireless communications industry. These letters confirm that the proposed number of antennas per pole and the increased height of a permitted Small Cell Node are required to accommodate the equipment specifications needed to deploy 5G technologies.



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We look forward to appearing before the Commission this evening. Thank you for your consideration in this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Kristen Motel", is written over a light blue horizontal line.

Kristen Motel

Enclosures

cc: Aimee Chambers, AICP, City of Hartford Director of Planning  
Paul Ashworth, City of Hartford Senior Planner  
AT&T  
Centerline Communications, LLC  
Christopher B. Fisher, Esq.



October 25, 2021

Via E-Mail to [Aimee.chambers@hartford.gov](mailto:Aimee.chambers@hartford.gov)

Aimee Chambers, AICP  
Director of Planning  
City of Hartford  
Hartford City Hall  
550 Main Street  
Hartford, CT 06103

Re: T-Mobile Comments on AT&T Petition for a Minor Zoning Text Amendment – Small Cell Regulations – Section 4.20.7.F

Dear Ms. Chambers:

I write on behalf of T-Mobile Northeast, LLC (“T-Mobile”) regarding the City of Hartford’s (the “City”) consideration of a text amendment to modify the allowed height of an antenna array on municipal-owed structures from 3 to 6 feet. T-Mobile appreciates the City’s continued engagement with wireless carriers on these issues.

As you know, T-Mobile provides wireless communication services across the City to its residents, business community, and visitors. As individuals become ever more reliant on wireless services exclusively and their data demands continue to grow, this new infrastructure becomes increasingly important. It is also critically important to the deployment of 5G. As a result, T-Mobile actively encourages jurisdictions to put measures in place that will enable wireless providers to densify their networks using a range of technologies to achieve the coverage, capacity, and performance their networks need. This densification will require the deployment of, and upgrades to, traditional macro sites and the deployment of new infrastructure (e.g., small cells).

T-Mobile proudly engages cooperatively with jurisdictions across the country to develop ordinances and regulations that encourage the deployment of next generation wireless technology, while simultaneously preserving the aesthetic character of those communities. To that end, T-Mobile supports AT&T’s petition for a Minor Zoning Amendment. This change will allow wireless carriers, like T-Mobile, to further enhance our network, ensuring a quality experience for customers and constituents, while meeting the City’s aesthetic guidelines.

We thank you in advance for your consideration of this proposal. Please feel free to reach out me or Stacey Briggs in our Government Affairs Department with any questions.

Sincerely,

*Tim Halinski*

Tim Halinski  
Corporate Counsel, T-Mobile



Via Email

October 25, 2021

Aimee Chambers, AICP  
Director of Planning  
City of Hartford  
Hartford City Hall  
550 Main Street  
Hartford, CT 06103

**RE: Support for Petition for Minor Zoning Text Amendment (Section 4.20.7.F)**

Dear Ms. Chambers,

On behalf of CTIA, the trade association for the wireless communications industry, I write in support of the proposed zoning text amendment appearing before the Planning and Zoning Board on October 26. The zoning text amendment would modify the allowed height of an antenna array on municipal-owned structures from 3 to 6 feet to facilitate 5G services. This amendment would allow for necessary upgrades of wireless networks within Hartford, providing improved wireless service and increased connectivity for residents, businesses, and visitors alike.

The performance and reliability of wireless networks during the Coronavirus (“COVID-19”) pandemic is a result of decades of capital investment by CTIA members. COVID-19 exposed the need for increased connectivity in nearly every sector of our economy, and has highlighted just how important it is for wireless communications to be reliable, fast and prepared to handle increased demand.

The need for wireless connectivity is especially true in Connecticut where there are more wireless devices than there are residents.<sup>1</sup> In addition, more than 41% of Connecticut residents live in wireless-only households.<sup>2</sup> To meet the needs of these customers, including the residents of Hartford, wireless networks need to be updated to meet existing demand and readied for 5G, the next generation of wireless services. Small cells will provide needed additional capacity to accommodate consumer’s insatiable demand for mobile data. In fact, according to CTIA’s annual wireless survey, mobile data traffic grew to 42.2 trillion megabytes in 2020, an increase of more than 200% since 2016.<sup>3</sup>

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<sup>1</sup> FCC, Voice Telephone Services Report: Status as of June 30, 2017, at <https://www.fcc.gov/voice-telephone-services-report>, last accessed 10/21/2021.

<sup>2</sup> CDC, National Center for Health Statistics, [https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless\\_state\\_201912-508.pdf](https://www.cdc.gov/nchs/data/nhis/earlyrelease/Wireless_state_201912-508.pdf), last accessed 10/21/2021.

<sup>3</sup> “2021 Annual Wireless Survey,” CTIA, July 27 2021, <https://api.ctia.org/wp-content/uploads/2021/07/2021-Annual-Survey-Highlights.pdf>, last accessed 10/21/2021.



Small cells will also help unlock new 5G services from remote healthcare and learning solutions to autonomous vehicles. Communities like Hartford will be more connected, and entire sectors, including education, tourism, transportation, and public safety, will be transformed.

It is also important to note the enormous economic benefits localities will experience due to 5G deployments. The Boston Consulting Group (BCG) estimates that over the next decade, 5G deployments will contribute \$1.5 trillion to US GDP and create 4.5 million jobs. Specifically in the Hartford, East Hartford and Middletown area, BCG estimates \$5.6 billion will be contributed to the area's GDP and 14,000 jobs could be created in the next decade.<sup>4</sup>

In order to achieve these incredible 5G benefits, the proper wireless infrastructure must be in place. The capital investment decisions made by CTIA members regarding how and where to construct facilities are data-driven, based on network need, and made many years in advance.

These investments require State and local governments to enact forward-looking legislation which enable these investments to take place.

Thank you for your consideration of this zoning text amendment, and we encourage the City of Hartford to continue engaging with the wireless industry on this important issue.

Sincerely,

David J. Maloney  
Director  
Local Affairs

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<sup>4</sup> "The 5G Economy Will Spur Massive GDP and Job Growth Across the US." *BCG Global*, Feb. 2 2021, [https://www.ctia.org/the-wireless-industry/the-5geconomy/map/states/Connecticut/metro\\_areas/1](https://www.ctia.org/the-wireless-industry/the-5geconomy/map/states/Connecticut/metro_areas/1), last accessed 10/21/2021.