

March 18, 2010

Observations and Questions Provided to:

Brad Townsend, Director of Planning and Zoning in Roswell, Roswell Mayor and City Council, Roswell Officials, and T-Mobile.

Prepared by:
Michael Nyden
580 Indigo Drive
Roswell, GA 30075
(770) 642-6133

Submitted by a Citizens Group including Homeowners in/on Lake Charles Drive, Lake Charles Plantation community, Meeting Street community, Land O Lakes community, Creekside community, Maycroft Court, and others.

We ask for responses to each of the observations and/or questions posed, and for comment, in writing or electronic equivalent.

Issues :
T-Mobile
Site Selection – Question of conclusion
What alternate sites were evaluated?

A tax map analysis was provided as a part of the T-Mobile application as Exhibit A and is included at the end of this document. This provides information regarding the search area and what parcels were investigated.

What alternate sites are available?
Was consideration given to Fellowship Christian School site, .3 miles from 740 Jones (fire station) site

The Fellowship Christian School is too close to existing sites, as shown on the submitted coverage maps, to provide improved service to the area in need.

What criterion was used to eliminate potential locations?

A variety of criteria are used to determine a property's potential as a facility location, one being proximity to existing T-Mobile antenna locations, and the ability to improve coverage in the area in need. Other criteria, includes, compliance with Roswell's code and property owner interest.

How was the Lake Charles Site established as the preferred location?

The proposed location meets the variety of criteria necessary to locate a new facility: it meets or exceeds the development standards set forth by the City of Roswell for telecommunications facilities, we have a willing landlord, and it is technologically favorable to satisfy coverage and service improvement objectives.

T-Mobile Contradictions - Please explain the disparity between T-Mobile's propagation maps, and – See "Exhibit B – Coverage Without Facility" Map provided by T-Mobile), and, T-Mobiles Marketing material – See accompanying Published Coverage Map for Voice Coverage, downloaded from T-Mobile Website

Which department is providing factual information?

(Observation - T-Mobile has fine reception at 1068 Lake Charles – Consistent with T-Mobile's published coverage map)

T-Mobile's Personal Coverage Check indicates the area around the proposed site location provides "moderate" and "good" service. The web site's definition of "moderate" is "You should usually be able to place calls outdoors, occasionally in a car, but only sometimes indoors." The definition of "good" is "You will likely be able to place calls outdoors, in a car, and occasionally indoors."

The stated objective of this proposed site is to provide "in-building coverage in residential areas surrounding Jones Road, Shallowford Road and Woodstock Road in Roswell Georgia. It will also minimize dropped calls in the aforementioned area."

T-Mobile has proposed this location because there is a need to improve service to our customers, particularly where they use their wireless devices most: in their homes. As a business, T-Mobile has a responsibility to ensure our customers experience service quality they have come to expect. As more people drop their landlines every year in favor of using their wireless phone exclusively, and as more people use their wireless devices for internet service, providing in-home service is crucial.

The two maps do not contradict one another. Although presented in different formats, they both reflect the same information: T-Mobile has a need to improve service to this area of the City of Roswell.

Please provide results of actual driving study showing service – ability to make and receive phone calls

Please Provide FCC Rules and/or legal citations supporting the assertion that T-Mobile provide service inside home. Please provide case law, if available.

T-Mobile seeks to provide service in our customers' homes because they want to use their wireless devices wherever they are. People are accessing the internet with their wireless devices more than ever. 60% of mobile phone calls are made from the home (USA Today, April 2007). We have a responsibility to our customers and our business to provide the best service possible, where people want to use it, and where they use it the most.

Please provide background information regarding T-Mobile's assertion that "This facility is a necessity as T-Mobile is responding to the demand of its customers, many of whom no longer use their land lines, but instead use their cellphones for everyday activities and emergencies." (See Accompanying "Revised Letter of Intent," Page 1 – Part of T-Mobile's Application)
Please provide supporting documentation to support the assertion in the previous paragraph – especially those customers who no longer use their land lines.

According to the Center for Disease Control, in 2009 16.5% of Georgia households were wireless only, and 15% of Georgia adults were wireless only. 31% of adults ages 25 to 29 live in households that use only cell phones (RCR Wireless News, December 2007). Half of the U.S. residents who moved households in the last three months of 2006 did not reconnect their landlines.

T-Mobile is a business responding to the trends of the wireless marketplace and the demands of wireless customers.

Please provide record of every demand made within the area proposed to be affected
Please provide documentation regarding the number of T-Mobile customers within the area proposed to be impacted
Please provide Documentation on the number of T-Mobile Customers within the area proposed to be impacted that "...no longer use their land lines..."
Please provide any other information supporting this assertion

The information requested in the preceding items is proprietary. T-Mobile has a responsibility as a business to provide the best service possible to our customers; any other business providing any kind of service or product has the same responsibility. If ONE customer demanded improved service, if ONE customer will receive the benefit of improved service, T-Mobile has a right to request this permit, as outlined in the City of Roswell ordinance, in order to provide improved service.

Please provide any information support T-Mobile's assertion that this site, or one nearby, is necessary to provide E911 service. – Please provide information/explanation of
Locating E911 caller utilizing time/and or angle to transmitter receiver, and,
GPS internal to the cell phone
Locating E911 caller using other
What percentage of T-Mobiles cell phones are delivered with GPS capability? (Not necessarily enabled for the user)

This site will provide improved access to 911. Because coverage indoors surrounding the proposed site is not available at every location, this site will allow more people in the vicinity to access 911 and other public safety resources, in turn making the entire community safer.

Please see the enclosed information page titled "Understanding 911" for a more technical explanation of the technology T-Mobile uses to provide enhanced 911. This technology is a network-based solution, which works optimally with at least three different antennas locations. Many factors determine the ease with which an emergency responder will find the caller dialing 911. The more antenna locations in proximity to the distress caller, the more accurately the technology will work.

T-Mobile also offers “3G” services to many locations across the country, the greater Atlanta area, including Roswell, being one of them. Customers using a 3G enabled phone may access 911 services through a handset-based solution, via built-in GPS. Today, the vast majority of T-Mobile customers still access the “2G” network, and as they replace their handsets over the years, they will migrate to 3G services and the accompanying GPS-based location services.

Please provide evidence of the Impact of New T-Mobile Tower at Crabapple middle school on service in the area of 1060 Lake Charles

Coverage maps that have been submitted show the impact of the facility at Crabapple Middle School. Please see coverage maps attached hereto. The Crabapple Middle School is shown as 9AT1129C.

Please provide an explanation regarding how T-Mobile expects to meet the FCC Requirement to maintain power to equipment that provides service (Ruling post Katrina)
Required by FCC rule – Provided in soft Copy to Roswell P&Z

This rule proposed by the FCC, commonly referred to as the Katrina Order, is no longer being considered, was never enacted, and hasn’t been a consideration for at least a year.

Please explain the generator referenced in Notes on plans (See Accompanying - “Proposed Plans 2/10/2010” page 27, Note 2) – Why is it referenced?
Why is the Physical location of the referenced Generator not shown on plans
Why is the Location of Fuel Storage Tank, which per municipal code must be buried, not shown on plans?

There will be no generator at the site and the site plans have been revised to reflect this.

Please provide an Environmental impact statement if available, and if not available, offer explanation why one has not been requested

There is no environmental impact study available. T-Mobile is not required by local, state or federal jurisdictions to provide an environmental impact study. We are required to perform a Phase I and NEPA/SHPO Study prior to any construction activities.

What are the expected impacts of disturbing the site?

The site plans and construction drawings that have been submitted provide the details and limits of the construction of the proposed site. Approved erosion and sedimentation controls are indicated on sheet C3.4. These plans will be reviewed by the professional staff of the City of Roswell prior to the issuance of a building permit.

What are the expected impacts of Pollution by diesel smoke
What are the potential impact of a diesel fuel leak
What are the potential and expected impacts of burying a fuel tank

No longer applicable because there will be no generator on-site.

What are the expected and potential threats to the environment over time

What are the expected impacts to Migratory Birds and other wildlife? Please provide reference to independent studies showing impact.

The general consensus is that migratory birds are impacted by towers that are along coastal areas, exceed 200 feet, are lighted, and include guy wires. This site includes none of the above criteria: the tower is not near a coastal area, is 108 feet in height, will not be lighted, and will include no guy wires.

T-Mobile – Service Providers

How will T-Mobile access the MTSO?

T-Mobile will access the MTSO by utilizing the existing infrastructure available in the area. T-Mobile will access the current infrastructure as shown on Sheet E1 and E1.1 of the submitted site plans and construction drawings.

Does capacity of T-Mobile and other carriers exist to transport data to MTSO(S)?

Yes.

What is actual location of MTSO?

This information is confidential and will not be provided for security reasons.

Where will it be necessary to dig/trench? – Please provide statement from service provider

If digging/trenching is necessary, what is the impact of digging on Lake Charles or elsewhere? –

Please provide statement from service provider

What is the environmental impact of digging on Lake Charles or elsewhere, if digging must take place?

The only digging required to access the current infrastructure is shown on Sheet E1 and E1.1 of the submitted site plans and construction drawings. There should not be any digging required on Lake Charles Drive by T-Mobile.

How will other carriers access their MTSO?

What is actual location of MTSO(s) of other potential carriers?

Where will it be necessary to dig/trench? – Please provide statement from every anticipated service provider

If digging/trenching is necessary, what is the impact of digging on Lake Charles or elsewhere? –

Please provide statement from service provider

What is the environmental impact of digging on Lake Charles or elsewhere, if digging must take place?

Any future co-locators on this facility will access their respective MTSOs in the same manner as T-Mobile. T-Mobile does not and cannot speak on behalf of any other co-locators beyond this general observation.

T-Mobile – Other - Please identify the engineering specification that prevents tower extensions greater than the minimum height required for the tower (Reference - Accompanying “Revised Letter of Intent,” Page 8).

There are no engineering restrictions to increasing the height of the tower. If desired by the City Council, T-Mobile would accept a condition of approval that the proposed tower exceed 108’.

Would it be possible, from an engineering perspective, to raise the height of the tower, as was done at the Hembree Road site? If yes, would a rise in height require guy wires, lights, FAA coloration, etc., or,

A raise in height would not require guy wires. Lights are not required unless the structure exceeds 199’.

Please identify the engineering specification, reference, or other, identifying that this tower can never be extended higher, by any means.

There are no engineering restrictions to increasing the height of the tower. If desired by the City Council, T-Mobile would accept a condition of approval that the proposed tower does exceed 108’.

T-Mobile – Other – Please confirm “user” in the context provided by T-Mobile - “... the proposed tower will be designed for a total of three users.” (See Accompanying “Revised Letter of Intent, “ Page 8)

Please confirm that a “user” as T-Mobile applies the word, means cellular telecommunications provider, and please provide the frequency range of the proposed user(s). (This is noted, but not spec’ed.)

User is defined as any other wireless provider such as Verizon, AT&T, Sprint, Metro PCS and Clearwire. We have no proposed additional users at this time. Their frequencies ranges can be found at www.wirelessadvisor.com. Facilities are also capable of accommodating equipment used by municipalities, such as emergency responders.

Please confirm that no additional antennae will be added, by T-Mobile or other “users”, or, T-Mobile will allow additional carriers on this proposed tower, this is encouraged by the City of Roswell.

Over time as technology advances and evolves, T-Mobile may upgrade its equipment at this facility, as it does all over the network. All additions and modifications are completed in total compliance with local, state, and federal laws and regulations. Any other carrier wishing to co-locate on this structure will also be required to comply with the same standards.

Please direct me to the page identifying the specifications of additional antennae, their appearance, positioning, etc.

Sheets C4 and C4.1 provide information regarding the placement of the T-Mobile antennas.

T-Mobile - Other

Who is responsible for the suitability of the proposed tower for this application since T-Mobile's Engineer, Walker Engineering, "...accepts no responsibility for the suitability of the tower to carry existing and proposed loads." (See Accompanying "Proposed Plans 2-10-2010," Page 12, note 1.)

Upon approval and as a part of the building permit submittal package, T-Mobile will provide stamped engineered drawings for the proposed tower.

Are detailed plans for the proposed tower available for review?

If so, please provide, and,

If not, why not.

There are no tower and foundation drawings available at this time. This will be produced at the time of the building permit submittal. Tower and foundation drawings are not required as a part of this application, and are provided at the time a specific facility is ordered and permitted.

T-Mobile – Other – Please provide references from municipalities/customers similar in nature and scope to that proposed.

We are in different phases of sites throughout the metropolitan Atlanta area and will not provide any information in regards to these areas due to the proprietary nature.

Why are other providers able to provide service from existing towers, and T-Mobile is not?

Please Explain.

Although T-Mobile cannot and will not speak to the specifics of other carriers' network design and service levels, there are many factors that could affect a particular carrier's ability to provide service in a given area. Every carrier's network limitations are different. Capacity and customer load (the number of subscribers accessing the network at one time), and frequency are a few of the many impacting variables.

T-Mobile seeks to co-locate on existing facilities whenever possible, and is co-located on every surrounding facility nearest to this proposed site.

Please provide all information from residents complaining to T-Mobile about inadequate service in the area of 1060 Lake Charles.

Please provide Raw Numbers of complaints specifying the proposed area of additional coverage

Please provide All specifics of every complaint, including location from which complaint was made

Please provide any material, including voice recordings, supporting the complaints and number of complaints provided

The information requested in the preceding questions is proprietary. Similar to the response requesting information about the number of T-Mobile customers impacted, one dropped call or one complaint is too much: we have determined there is a need to improve service in this area to a level deemed acceptable by our engineers charged with monitoring the network. As a company we are certainly entitled to determine the service levels we deem acceptable. We have applied for a permit with the City of Roswell in absolute compliance with the development standards set forth by the ordinance.

Who are the Parties to the proposed Lease, i.e., will it be T-Mobile South, LLC, or some other entity.

T-Mobile South LLC

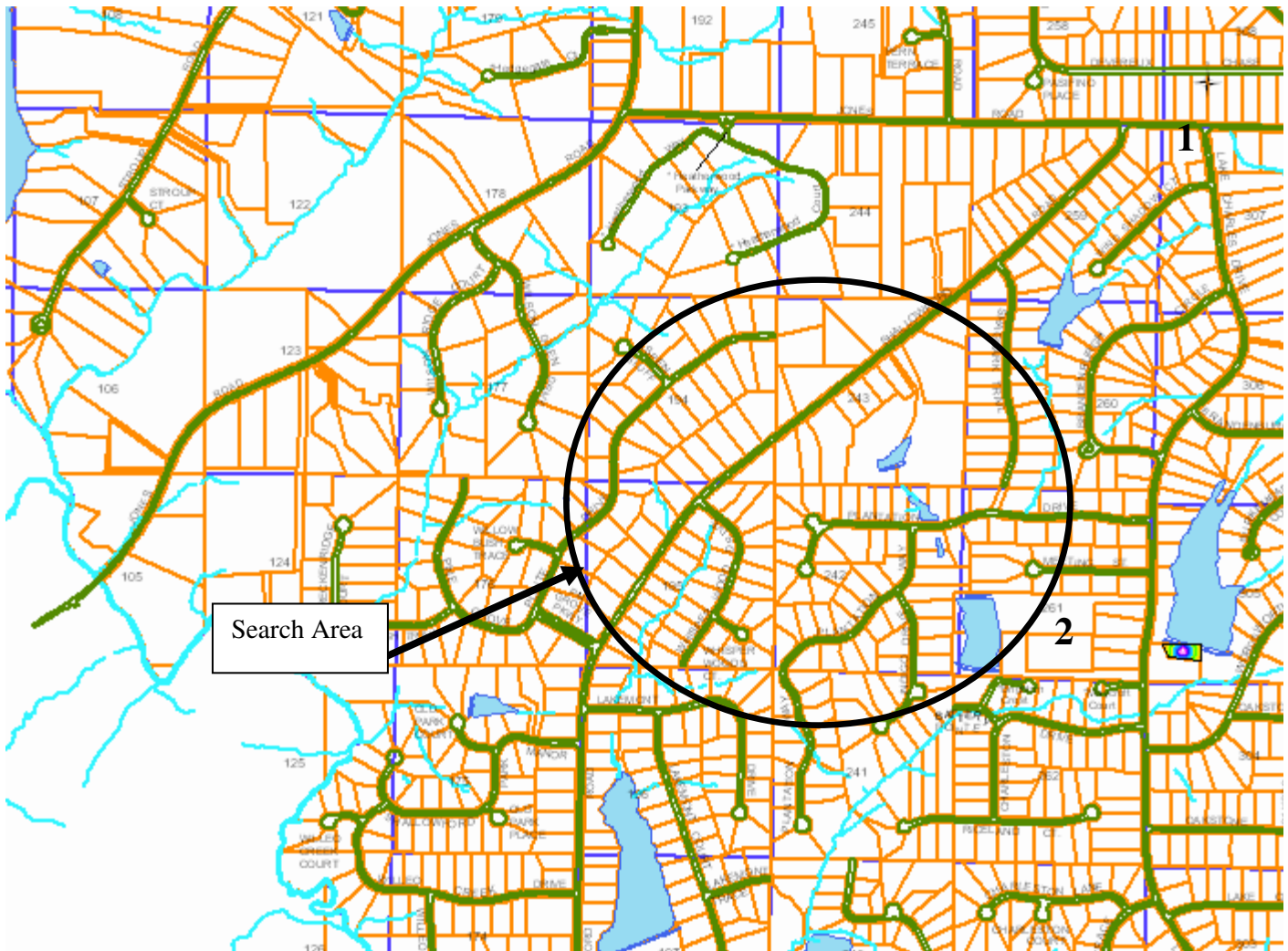
Please describe the relationship between T-Mobile South, LLC and parent company.

T-Mobile South LLC is the legal entity name for T-Mobile USA operating in Georgia. T-Mobile USA is a subsidiary of Deutsche Telekom AG.

Please Provide Financials for T-Mobile South LLC.

Information for T-Mobile USA can be found at www.t-mobile.com/Company

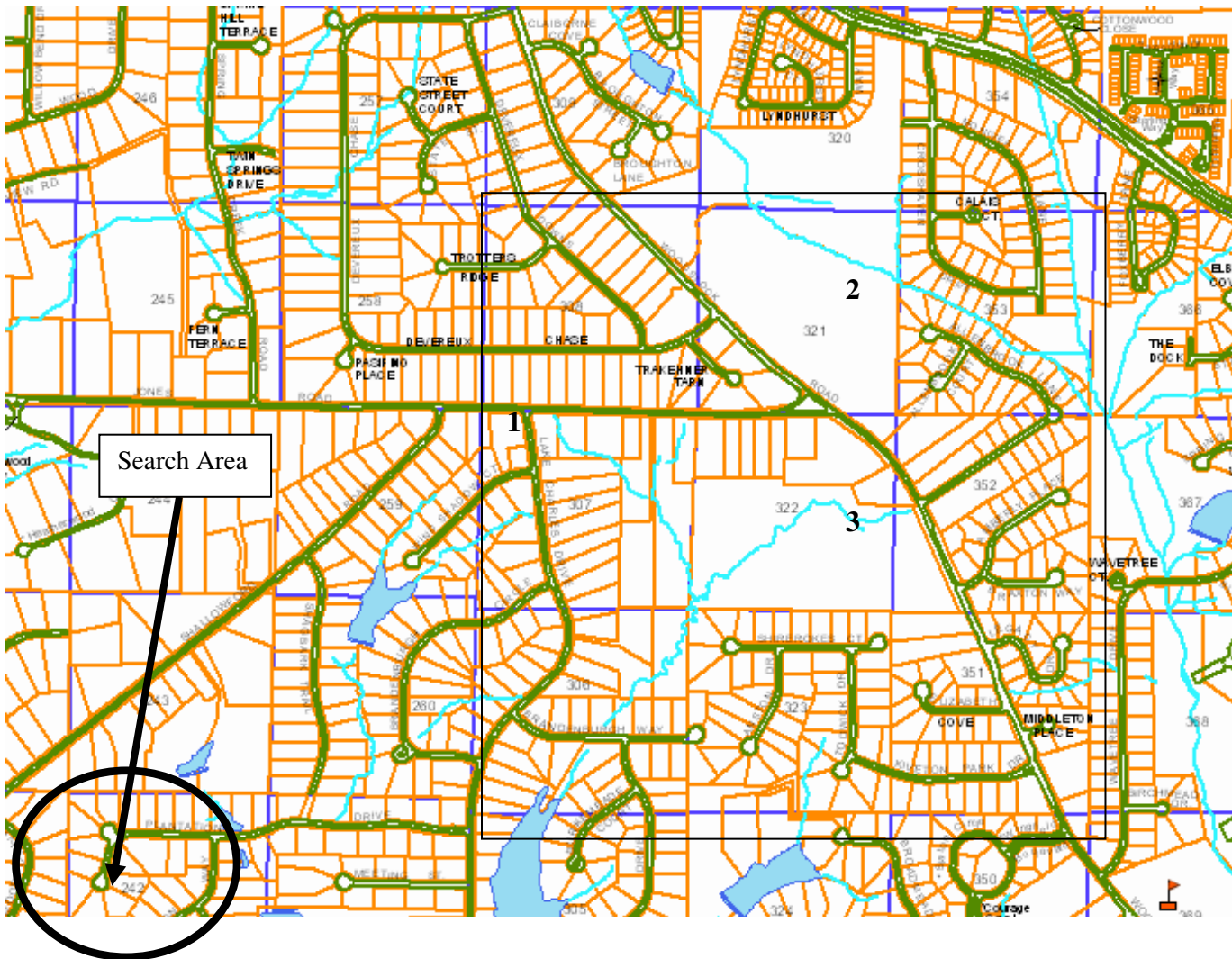
TAX MAP ANALYSIS



Search area is developed with single family homes and are zoned as such. Larger tracts within the search area are developed with single family homes and do not meet the intent of the City of Roswell code.

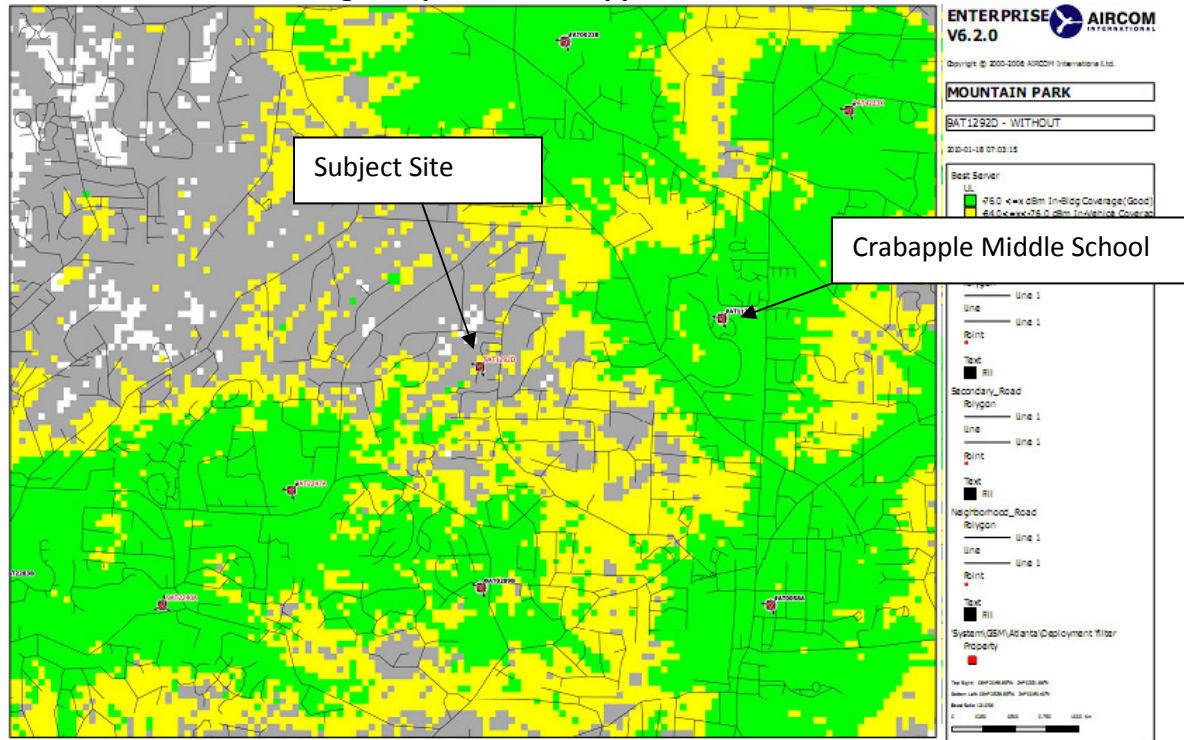
1. City of Roswell Fire Dept. – Although property established as a preferred facility location the proposal was rejected by City of Roswell.
2. Proposed location – undeveloped parcel.

TAX MAP ANALYSIS (continued)

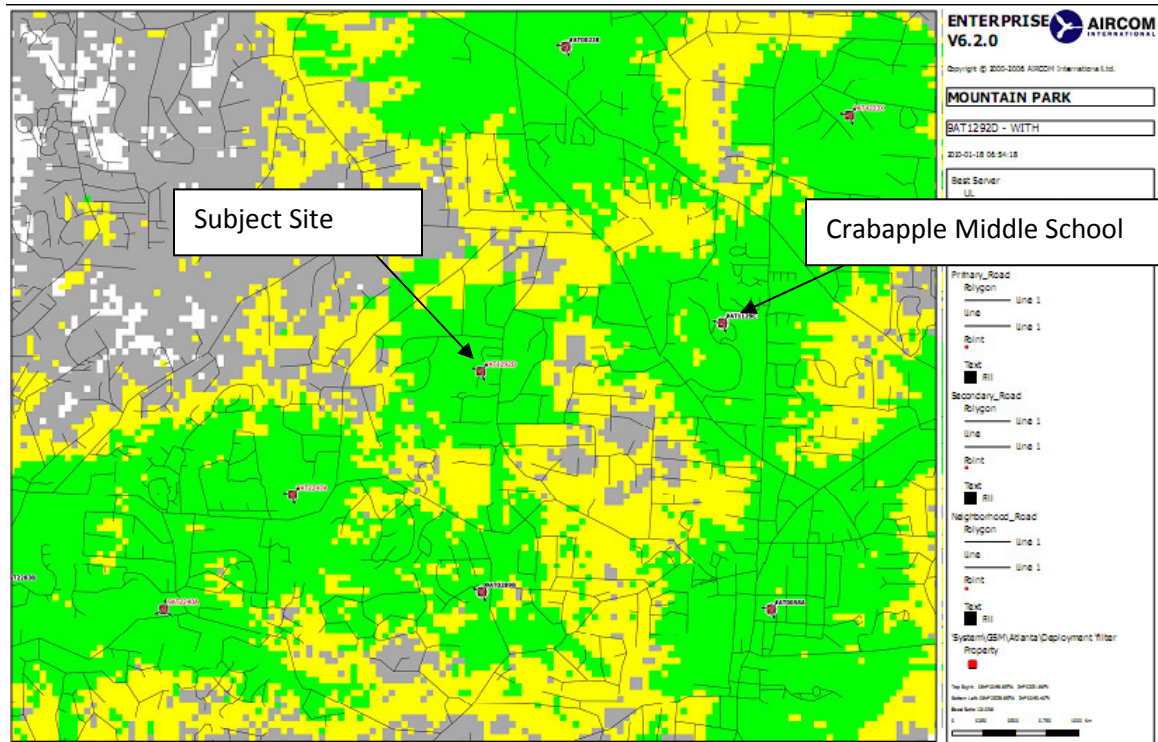


1. City of Roswell Fire Dept. – Although property established as a preferred facility location the proposal was rejected by City of Roswell.
2. Property too far east to provide seamless, ubiquitous, and reliable coverage.
3. Properties too far east provide seamless, ubiquitous, and reliable coverage.

Coverage Maps with Crabapple Middle School Site



WITHOUT



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