

SLUP-12  
(2013)

COBB COUNTY GEORGIA  
FULTON OFFICE

2013 SEP 16 PM 3:24

COBB COUNTY ZONING DIV

NO.	REVISION	DATE	BY
1.	Added Parent Parcel Boundary Info, Corrective Language	9/5/13	DAL

RAWLAND TOWER SURVEY  
DRAWN BY: DAL  
CHECKED BY: TAD  
FIELD CREW: TJS  
APPROVED BY: TAD  
DATE: 7/22/13  
SCALE: 1" = 50'

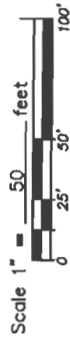
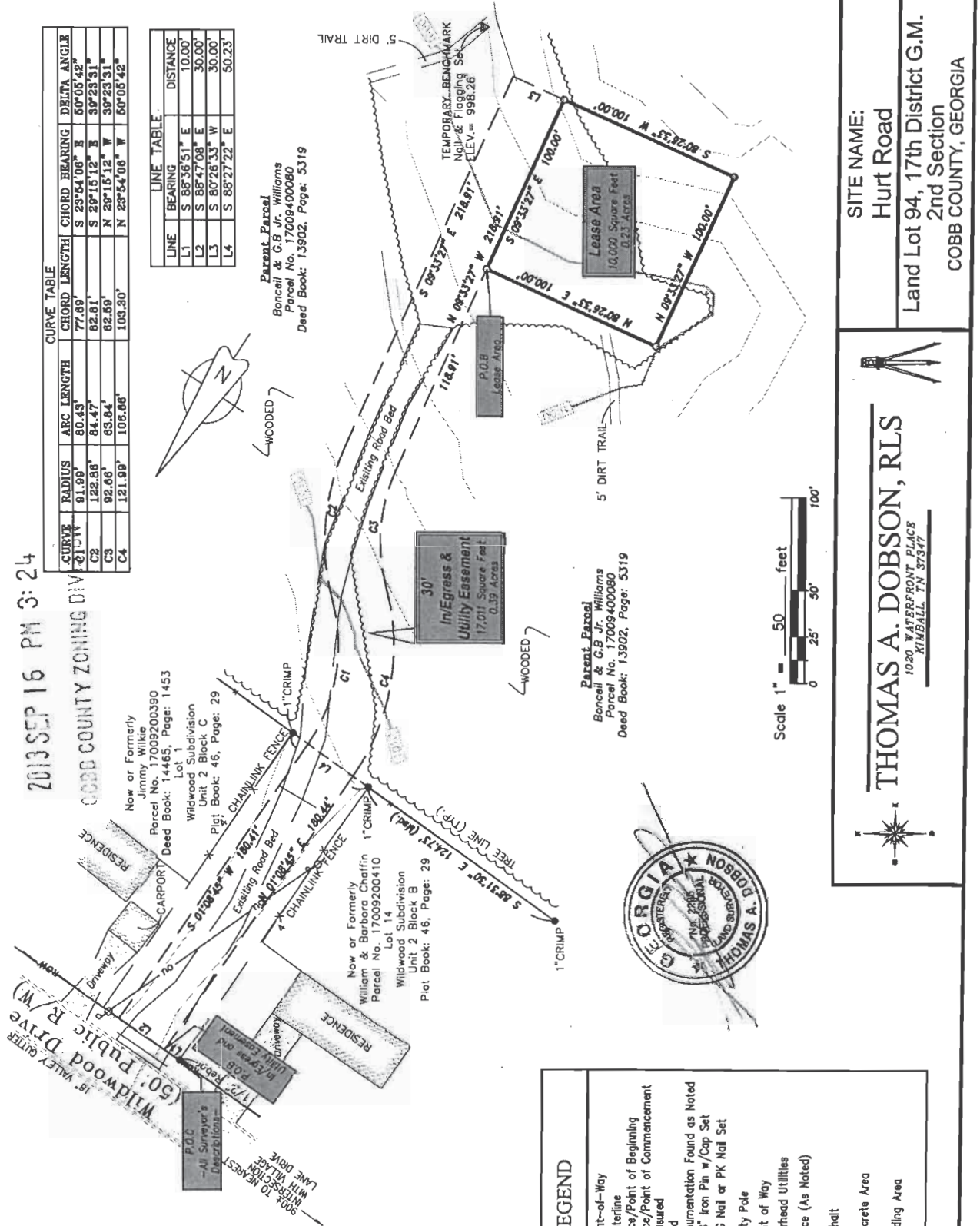
AT&T MOBILITY SERVICES, LLC

PREPARED FOR:

CURVE	RADIUS	ARC LENGTH	CHORD LENGTH	CHORD BEARING	DELTA ANGLE
C1	91.99'	80.43'	77.89'	S 23°54'08" E	50°05'42"
C2	122.66'	84.47'	82.81'	S 29°15'12" E	39°23'31"
C3	92.06'	65.84'	62.59'	N 29°15'12" W	39°23'31"
C4	121.99'	106.06'	103.30'	N 23°54'08" W	50°05'42"

LINE	BEARING	DISTANCE
L1	S 88°36'51" E	10.00'
L2	S 88°47'08" E	30.00'
L3	S 80°28'13" W	30.00'
L4	S 88°27'22" E	50.23'

Parent Parcel  
Boncell & G.B Jr. Williams  
Parcel No. 17009400080  
Deed Book: 13902, Page: 5319



Parent Parcel  
Boncell & G.B Jr. Williams  
Parcel No. 17009400080  
Deed Book: 13902, Page: 5319

Parent Parcel  
Boncell & G.B Jr. Williams  
Parcel No. 17009400080  
Deed Book: 13902, Page: 5319

Now or Formerly  
Jimmy Wilkie  
Parcel No. 17009200390  
Deed Book: 14465, Page: 1453  
Wildwood Subdivision  
Unit 2 Block C  
Plot: Book: 46, Page: 29

Now or Formerly  
William & Barbara Chatfin  
Parcel No. 17009200410  
Lot 14  
Wildwood Subdivision  
Unit 2 Block B  
Plot: Book: 46, Page: 29

SITE NAME:  
Hurt Road  
Land Lot 94, 17th District G.M.  
2nd Section  
COBB COUNTY, GEORGIA



THOMAS A. DOBSON, RLS  
1020 WATERFRONT PLACE  
KINBALL, TN 37347



R/W	Right-of-Way
C	Centerline
P.O.B.	Place/Point of Beginning
P.O.C.	Place/Point of Commencement
Msd.	Measured
Dd.	Deed
o	Monumentation Found as Noted
Δ	5/8" Iron Pin w/ Cap Set
□	MAG Nail or PK Nail Set
φ	Utility Pole
—	Right of Way
—	Overhead Utilities
X	Fence (As Noted)
□	Asphalt
□	Concrete Area
□	Building Area

**APPLICANT:** RETEL Brokerage Services, Inc.  
404-343-2375

**REPRESENTATIVE:** Kathy Kelly-Jacobs  
770-330-9784

**TITLEHOLDER:** GBW Investment Partners, L.L.L.P.

**PROPERTY LOCATION:** West and north sides of Hurt Road,  
west of Alexander Place  
(448 Hurt Road).

**ACCESS TO PROPERTY:** Wildwood Drive

**PHYSICAL CHARACTERISTICS TO SITE:** Wooded Parcel

**CONTIGUOUS ZONING/DEVELOPMENT**

- NORTH:** R-20/ Wildwood Subdivision
- SOUTH:** R-20/ Single-family Residences
- EAST:** R-15/ Alexander Place Subdivision
- WEST:** R-20/ Stone Harbor Subdivision

**PETITION NO:** SLUP-12

**HEARING DATE (PC):** 12-03-13

**HEARING DATE (BOC):** 12-17-13

**PRESENT ZONING:** R-20

**PROPOSED ZONING:** Special Land  
Use Permit

**PROPOSED USE:** Wireless Communication  
Tower and Antenna

**SIZE OF TRACT:** 89.90 acres

**DISTRICT:** 17

**LAND LOT(S):** 94

**PARCEL(S):** 8

**TAXES: PAID** X **DUE** \_\_\_\_\_

**COMMISSION DISTRICT:** 4

**OPPOSITION: NO. OPPOSED** \_\_\_\_\_ **PETITION NO:** \_\_\_\_\_ **SPOKESMAN** \_\_\_\_\_

**PLANNING COMMISSION RECOMMENDATION**

**APPROVED** \_\_\_\_\_ **MOTION BY** \_\_\_\_\_

**REJECTED** \_\_\_\_\_ **SECONDED** \_\_\_\_\_

**HELD** \_\_\_\_\_ **CARRIED** \_\_\_\_\_

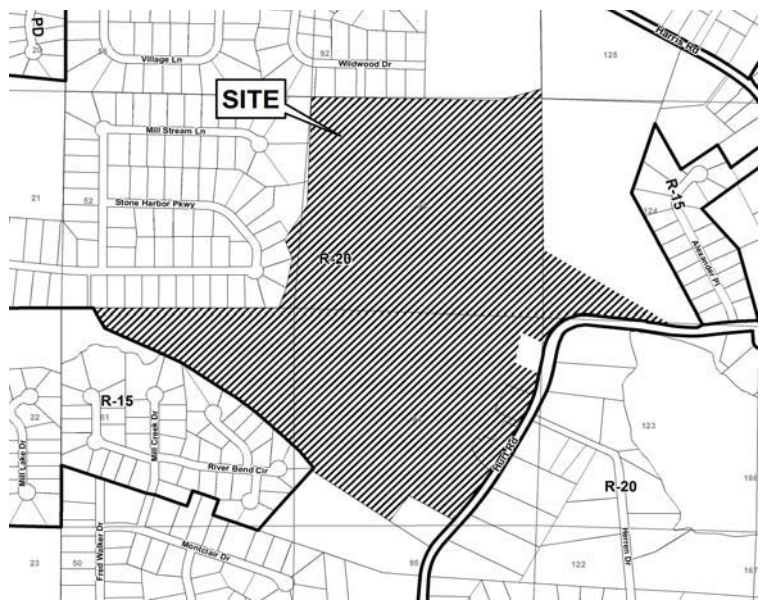
**BOARD OF COMMISSIONERS DECISION**

**APPROVED** \_\_\_\_\_ **MOTION BY** \_\_\_\_\_

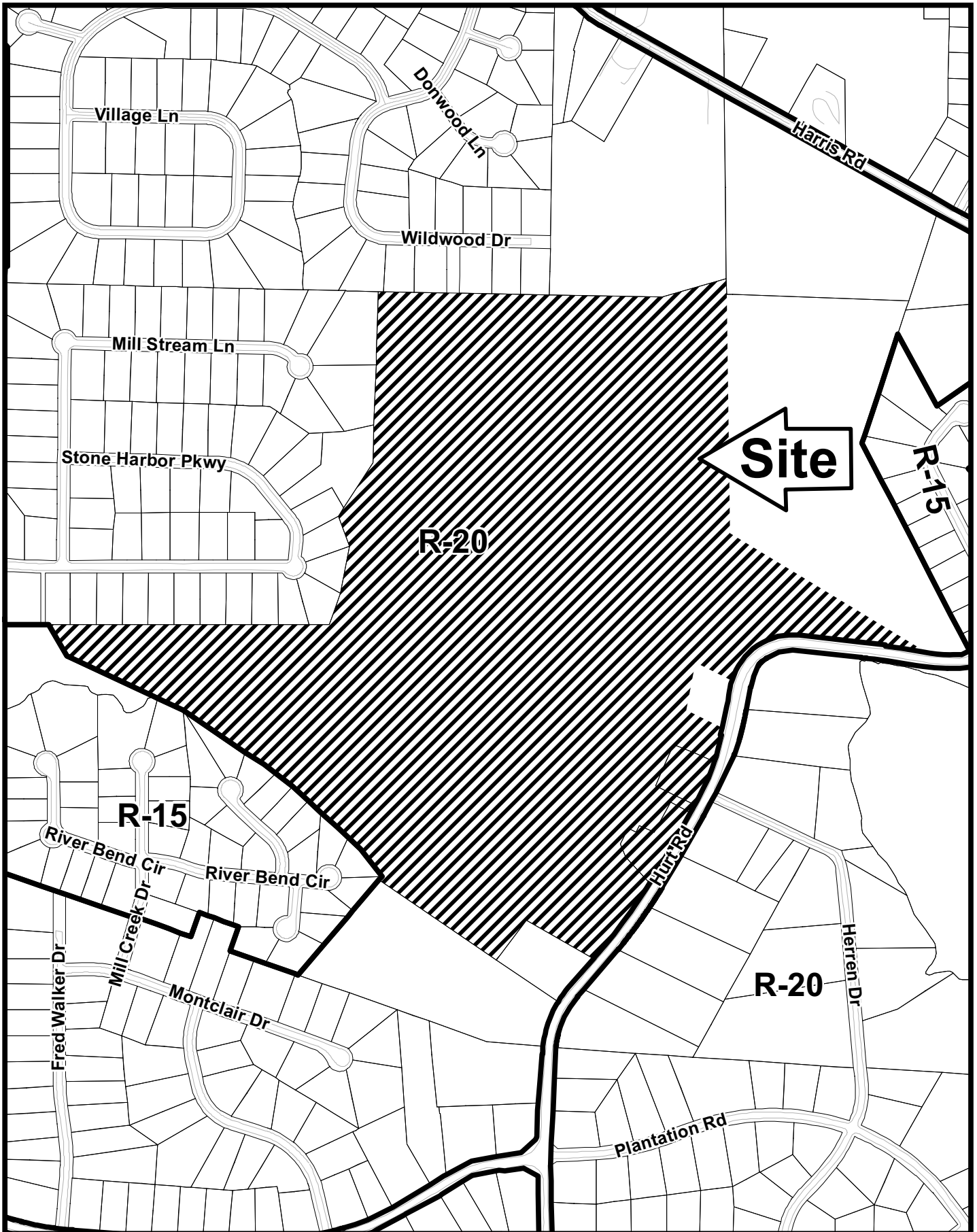
**REJECTED** \_\_\_\_\_ **SECONDED** \_\_\_\_\_

**HELD** \_\_\_\_\_ **CARRIED** \_\_\_\_\_

**STIPULATIONS:**



# SLUP-12



This map is provided for display and planning purposes only. It is not meant to be a legal description.

0 300 600  
Feet



City Boundary  
Zoning Boundary

**APPLICANT:** RETEL Brokerage Services, Inc.

**PETITION NO.:** SLUP-12

**PRESENT ZONING:** R-20

**PETITION FOR:** SLUP

\*\*\*\*\*

**ZONING COMMENTS:** Staff Member Responsible: Terry Martin, MPA

The applicant is requesting a Special Land Use Permit (SLUP) for the purpose of installation of a wireless communication tower and antennae as well as accompanying ground equipment. The tower is a proposed 150 foot tall monopole situated on a 100 foot by 100 foot lease area within the 84 acre site that currently contains an equestrian facility GB's Stables. The site includes Mill Creek Lake and much of it is located within the 100 year flood plain. The proposed site of the tower has been chosen by the applicant based on the characteristics of the property such as topography, wetlands, and existing tree cover in order to give the best location for the tower. The tower will accommodate at least three (3) users and will be enclosed by a six (6) foot tall chain link fence with three (3) strands of barbed wire. Access to the site is provided by an easement from Wildwood Drive and the applicant confirms adherence to all FAA and FCC standards and regulations.

Applicant's proposal adheres to the requirements of Sec. 134-273 in setback from residential properties (equal to height of tower plus 10%), providing for at least three (3) users, six (6) foot fence plus barbed wire, FAA and FCC compliance, etc. While the Code requires the height above the tree line no greater than necessary or for a "stealth" type of tower be constructed, the applicant has chosen the site in accordance with existing topography and tree cover so as to provide the best screening on the site. For this reason as well, the otherwise required 15 foot landscape buffer should not be necessary.

The County's contracted consultant, CityScape Consultants, Inc. has provided an analysis that confirms the applicant's demonstrated need for the proposed tower. In fact, given the increasing need for services, the consultant has recommended that the applicant be asked to provide space for at least six (6) carriers on the proposed tower. This suggestion is given with consideration of the proposed height of 150 feet as well as general tree heights in northwest Georgia topping out at 80 to 90 feet; anticipating that six (6) carriers can be accommodated with antenna placement down the tower to a height of 100 feet. The consultant has suggested stipulations that are reiterated at the end of this analysis under "Staff Recommendations."

**Historic Preservation:** No comment.

**Cemetery Preservation:** No comment.

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**WATER & SEWER COMMENTS:**

No comments.

\*\*\*\*\*

**TRAFFIC COMMENTS:**

Recommend a FAA Airspace Study.

Recommend paving the driveway with a treated hardened surface 25 feet from the right-of-way.

Recommend applicant be required to meet all Cobb County Development Standards and Ordinances related to project improvements.

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**APPLICANT:** RETEL Brokerage Services, Inc.

**PETITION NO.:** SLUP-12

**PRESENT ZONING:** R-20

**PETITION FOR:** SLUP

\*\*\*\*\*

**FIRE COMMENTS:**

After analyzing the information presented for a Preliminary Review, the Cobb County Fire Marshal's Office is confident that all other items can be addressed during the Plan Review Stage.

APPLICANT: RETEL Brokerage Services, Inc.

PETITION NO.: SLUP-12

PRESENT ZONING: R-20

PETITION FOR: SLUP

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**STORMWATER MANAGEMENT COMMENTS**

FLOOD HAZARD:  YES  NO  POSSIBLY, NOT VERIFIED

DRAINAGE BASIN: Mill Creek #2 (Nickajack Cr) FLOOD HAZARD INFO: Zone AE

- FEMA Designated 100 year Floodplain Flood.
- Flood Damage Prevention Ordinance DESIGNATED FLOOD HAZARD.
- Project subject to the Cobb County Flood Damage Prevention Ordinance Requirements.
- Dam Breach zone from (upstream) (onsite) lake - need to keep residential buildings out of hazard.

WETLANDS:  YES  NO  POSSIBLY, NOT VERIFIED

Location: outside site area

- The Owner/Developer is responsible for obtaining any required wetland permits from the U.S. Army Corps of Engineer.

STREAMBANK BUFFER ZONE:  YES  NO  POSSIBLY, NOT VERIFIED

- Metropolitan River Protection Area (within 2000' of Chattahoochee River) ARC (review 35' undisturbed buffer each side of waterway).
- Chattahoochee River Corridor Tributary Area - County review (\_\_\_\_\_ undisturbed buffer each side).
- Georgia Erosion-Sediment Control Law and County Ordinance - **County Review**/State Review.
- Georgia DNR Variance may be required to work in 25 foot streambank buffers.
- County Buffer Ordinance: **50'**, 75', 100' or 200' each side of creek channel.

DOWNSTREAM CONDITION

- Potential or Known drainage problems exist for developments downstream from this site.
- Stormwater discharges must be controlled not to exceed the capacity available in the downstream storm drainage system.
- Minimize runoff into public roads.
- Minimize the effect of concentrated stormwater discharges onto adjacent properties.
- Developer must secure any R.O.W required to receive concentrated discharges where none exist naturally
- Existing Lake Downstream \_\_\_\_\_.  
Additional BMP's for erosion sediment controls will be required.
- Lake Study needed to document sediment levels.
- Stormwater discharges through an established residential neighborhood downstream.
- Project engineer must evaluate the impact of increased volume of runoff generated by the proposed project on existing onsite lake.

APPLICANT: RETEL Brokerage Services, Inc.

PETITION NO.: SLUP-12

PRESENT ZONING: R-20

PETITION FOR: SLUP

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**STORMWATER MANAGEMENT COMMENTS – Continued**

SPECIAL SITE CONDITIONS

- Provide comprehensive hydrology/stormwater controls to include development of out parcels.
- Submit all proposed site improvements to Plan Review.
- Any **spring activity** uncovered must be addressed by a qualified geotechnical engineer (PE).
- Structural fill \_\_\_\_\_ must be placed under the direction of a qualified registered Georgia geotechnical engineer (PE).
- Existing facility.
- Project must comply with the Water Quality requirements of the CWA-NPDES-NPS Permit and County Water Quality Ordinance.
- Water Quality/Quantity contributions of the existing lake/pond on site must be continued as baseline conditions into proposed project.
- Calculate and provide % impervious of project site.
- Revisit design; reduce pavement area to reduce runoff and pollution.

INSUFFICIENT INFORMATION

- No Stormwater controls shown \_\_\_\_\_
- Copy of survey is not current – Additional comments may be forthcoming when current site conditions are exposed.
- No site improvements showing on exhibit.

ADDITIONAL COMMENTS

1. It is anticipated that significant overland flow path from proposed lease area and onsite lake will provide adequate stormwater management for this site.

## STAFF RECOMMENDATIONS

### **SLUP-12      RETEL Brokerage Services, Inc.**

The applicant is requesting a SLUP for the construction of a 150 foot wireless communication tower and associated equipment within a 100 foot by 100 foot lease area on the subject 84 acre property. The site's physical characteristics including Mill Creek Lake, wetlands, existing tree cover, as well as its size are among the acceptable reasons given by the applicant that the site is ideal for the requested monopole.

Intended for three (3) users, the tower's lease area will be fenced with a six (6) foot tall chain link fence that will be topped with barbed wire and is accessed by an easement off of Wildwood Drive. The tower's proposed location on the site should negate any further landscaping buffers being required and is located at least the height of the tower plus 10% from any residential properties.

Taking the suggestions of the consultant, the tower as proposed at 150 feet, can easily accommodate six (6) users with antennae placed along the tower down to a height of 100 feet. This allows for the antennae to be placed well above the average tree height of 80 to 90 feet seen in the local area.

Based upon the above analysis as well as the Site Review provided by the County consultant, CityScape, Staff recommends APPROVAL subject to the following conditions:

- Site Plan received by the Zoning Division September 16, 2013;
- The height of the tower to be no more than 150 feet;
- The applicant shall design the facility to support up to six (6) carriers of like design;
- The applicant shall provide satisfactory State Historic Preservation Office and National Environmental Policy Act documentation;
- AT&T Mobility shall attest the emergency generators noise shall not exceed 70db at the property boundaries;
- AT&T Mobility shall attest the emergency generator shall be tested between the hours of 9AM and 4PM Monday through Friday only; and
- All antenna and feed line ports are to be sealed to prevent access by birds and other wildlife.



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LEFT

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5781 Glenridge Drive NE  
Suite 110  
Atlanta, GA 30328

Kathy Kelly-Jacobs  
770-330-9784  
[kathy@retelservices.com](mailto:kathy@retelservices.com)

September 13, 2013

COBB COUNTY GEORGIA  
FILED IN OFFICE  
2013 SEP 16 PM 3:27  
COBB COUNTY ZONING DIVISION

**BY HAND DELIVERY**

Zoning Division  
Community Development Agency  
Cobb County, Georgia  
1150 Powder Springs Street, Suite 400  
Marietta, Georgia 30064

Re: Application for Special Land Use Permit, Cobb County, Georgia by RETEL Brokerage Services, Inc. for a wireless communications facility (the "**Application**") to be located at 448 Hurt Road, Smyrna, Georgia 30080 (the "**Property**")

**STATEMENT OF PROPOSED SITE IMPROVEMENTS**

Ladies and Gentlemen:

RETEL Brokerage Services, LLC (the "**Applicant**"), with respect to the Application, respectfully submits for your consideration the Application, the approval of which will result in the County's issuance of a special land use permit ("**SLUP**") to allow the construction, operation and maintenance of a wireless telecommunications tower and related antennas and equipment (collectively, the "**Facility**") on an approximately 10,000 square foot portion (the "**Site**") of the Property.

**Background - The Property and the Site**

The Property, owned by GBW Investment Partners, LLLP ("**Owner**"), is approximately 84.8-acre tract zoned R-20, with frontages on the northern side of Hurt Road and a small driveway off the southern side of Wildwood Drive. Owner's general partner and his family have resided across the street from the Property for more than 60 years. The Property is improved with Owner's family business, GB's Stables, which has served the equestrian community of Cobb County and surrounding Metro Atlanta for more than thirty years, offering riding lessons, birthday parties and boarding. Existing improvements include over 4 miles of riding trails, a lighted arena, a large pasture and a large barn to house the boarded horses. The Property includes a Mill Creek Lake and a significant portion of the Property is located within the 100-year flood plain. Neighboring subdivisions include River Cove Estates to the southeast (zoned R-15), Stone Harbor Subdivision to the east (R-20), and Wildwood Subdivision to the northeast (zoned R-20).

**RETEL Services**

Zoning Division  
 Community Development Agency  
 Cobb County, Georgia  
 September 12, 2013  
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Owner has leased the Site, together with utility and ingress/egress easements, to Applicant. The Site is located in the northeast corner of the Property, and it is a permitted use for the Site, upon issuance of the requested SLUP.

**The Facility / Proposed SLUP**

The Facility which Applicant plans to construct will include a one hundred fifty foot (150') high (154' including the lightning rod) multi-tenant monopole tower, ground-mounted communications equipment, and associated minor site improvements to facilitate operations and maintenance of and access to the Facility on the Site. The Facility meets all setback requirements set forth in Section 134-273(3)(a) of Chapter 134 of the Official Code of Cobb County, Georgia, as the same is amended from time to time (such Chapter being the "**Zoning Ordinance**").

Although generally, the Zoning Ordinance requires that towers are to be located on improved parcels "closer to the structure than to the boundary of the Parcel," Applicant notes that the size of the Property, topography, the lake and wetlands, existing access and existing tree cover all dictate that the Site is the best location on the Property for the location of the proposed Facility (and not adjacent to the existing barn located to the far south on the other side of the lake). Accordingly, as part of its SLUP, Applicant requests that the Cobb County Board of Commissioners (the "**Board**") allow the proposed Facility to be located within the Site based on the presence of these mitigating factors. *See* Zoning Ordinance § 134-273(3)(a)(2)(b).

AT&T is proposed to be the carrier located at the top of the Facility at a "rad center" (e.g., middle of antenna center) height of 150 feet. In addition to AT&T, T-Mobile South, LLC ("**T-Mobile**") is interested in collocating upon the Facility at a rad center height of 140 feet.<sup>1</sup> Additionally, the Facility will support one additional carrier. Accordingly, the Facility complies with the design requirements of Section 134-273(3)(b) of the Zoning Ordinance, as there is tower space for at least three carriers.

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<sup>1</sup> Indeed, T-Mobile has been attempting to locate a wireless structure or antenna array to serve this location since at least 2008. Specifically, Application No. SLUP-17 (2008) was T-Mobile's application for a special land use permit for a 150-foot tall wireless telecommunications tower, which was denied by the Board on August 19, 2008. Please note that T-Mobile's proposed site was in a different location on the Property and it was accessed by a significantly more cumbersome and lengthy access easement. Nevertheless, T-Mobile's need for coverage and capacity in this area has remained for more than five years. At the time SLUP-17 (2008) was heard, it was denied primarily because of one vocal adjacent property owner. Applicant is pleased to note that a number of its immediately adjacent neighbors, including many touching the Property line and fronting on Wildwood Drive have already signed the Contiguous Occupants and Owners Consent to Petition Form filed herewith evidencing their support for (or no objection to) the Application.

**RETEL Services**

Zoning Division  
Community Development Agency  
Cobb County, Georgia  
September 12, 2013  
Page 3

The equipment and other associated site improvements are shown on the plans submitted herewith and are limited to those uses associated with the operation of the antenna or towers and are appropriate in scale and intensity. The entirety of the Site will be enclosed with a six foot (6') high chain link fence with three strands of barbed wire, as more particularly shown on the enclosed plans. Additional details relating to the Site and the Facility are set forth in the plans submitted herewith. (See *Zoning Ordinance §§ 134-273(3)(c) and (d).*)

Access to the Facility will be via an access easement from Wildwood Drive across existing pavement and gravel access road. Applicant confirms that the Facility will meet or exceed current standards of the Federal Aviation Administration, the Federal Communications Commission, and any applicable agency guidelines governing the construction and operation of such a telecommunications tower. Applicant does not expect that the FAA will require the Facility to be lighted.

Once constructed, the Facility will be unmanned. Only monthly site visits by carriers' maintenance technicians are anticipated. The Facility will not have water and sewer services, and it will not generate any waste. Again, the only utility connections required are electric and telephone services. The electricity demand of the Facility will be similar to that of a single-family residence. The Facility will not create a significant demand for community services. In fact, the Facility will provide a service to the community in the form of safe, reliable and uninterrupted wireless service for use by the general public, emergency services personnel and others in this area of Cobb County.<sup>2</sup>

The Facility will be an integral part of the AT&T and T-Mobile wireless networks across Cobb County and other portions of the greater Atlanta area, as more particularly described in the radio frequency reports and analysis included with this Statement.

**Zoning Requirements**

Chapter 134 of the Zoning Ordinance, and specifically, Section 134-273 thereof, sets forth the zoning requirements applicable to the placement of communications towers and antennas on property within the County. In satisfaction of these requirements, and in addition to this Statement, Applicant hereby submits the following documents for the Division's review:

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<sup>2</sup>Applicant proposes no landscape buffer or screening around the Site because (i) the Facility is to be located within a heavily treed and vegetated area of the Property, which existing vegetation will provide screening of the ground equipment and accessory materials, (ii) any such landscaping or screening would not mitigate visual impact on adjacent property owners or travelers on Wildwood Drive, and (iii) manicured landscaping is not likely to survive in the midst of already dense vegetation and trees. Nevertheless, Applicant has sufficient room to provide a landscape buffer should the Board not waive the landscape requirement.

**RETEL Services**

Zoning Division  
Community Development Agency  
Cobb County, Georgia  
September 12, 2013  
Page 4

1. Application for Special Land Use Permit, Cobb County Georgia form, including original notarized signature of Owner and Applicant's representatives and including the Consent of Contiguous Occupants or Land Owners to Accompany Application for SLUP<sup>3</sup>;
2. A copy of the Property warranty deeds to Owner;
3. Metes and Bounds legal descriptions of Property and Site;
4. Copy of the paid tax receipt for the Property;
5. Zoning Standards Analysis (addressing SLUP considerations);
6. Site Plans (including survey and scaled elevation drawing of proposed tower) (5 full sized copies; 2 copies measuring 8 ½ x 11);
7. RF Engineer's Analysis from both AT&T and T-Mobile supporting the need for the Facility and including a documentation of all towers within a three-mile radius of the proposed Facility (per Zoning Ordinance Section 134-273(3)(m) [*Applicant notes it owns no towers within a 3-mile radius of the Site or elsewhere in the County*]);
8. Application and Consultant Fees (\$6,000.00); and
9. Sign Deposit and Fees (\$345.00).

The Application and the accompanying documents support Applicant's request for the Facility SLUP and comply with all Cobb County zoning requirements.<sup>4</sup> The Owner and

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<sup>3</sup> Applicant and Owner have obtained numerous signatures contiguous neighbors to the Site and files those signatures with the Application. Applicant will continue to contact these neighbors, and Applicant will also notify in writing all property owners within a 1,000-foot radius of the subject property as shown on the most current tax records. Such notice will be accomplished by mailing a copy of the Application form and proposed site plans by first class mail. Applicant will then file with the Zoning Division of Cobb County a certificate of mailing from the United States Post Office.

<sup>4</sup> Applicant notifies Cobb County of its constitutional concerns. If the Board denies the Application in whole or in part, then the Property does not have a reasonable economic use under the Zoning Ordinance. The Application meets the test set out by the Georgia Supreme Court to be used in establishing the constitutional balance between private property rights and zoning and planning as an expression of the government's police power. See Guhl vs. Holcomb Bridge Road, 238 Ga. 322 (1977). If the Board denies the Application in whole or in part, such an action will deprive Applicant and Owner of the ability to use the Property in accordance with its highest and best use. Similarly, if the Board limits its approval of the SLUP by attaching conditions thereto affecting any portion of the Property or the use thereof, either of such actions being taken without Applicant's consent, then such action would deprive Applicant and Owner of any reasonable use and development of the Property. Any such action is unconstitutional and will result in a taking of property rights in violation of the just compensation clause of the Constitution of the State of Georgia (*see Ga. Const. 1983, Art. I, § 3, para. 1(a)*), and the just compensation clause of the Fifth Amendment to the United States Constitution (*see U.S. Const. Amend. 5*). To the extent that the Zoning Ordinance allows such an action by the Board, the Zoning Ordinance is unconstitutional. Any such denial or conditional approval would discriminate between Applicant and Owner and owners of similarly situated property in an arbitrary, capricious, unreasonable and unconstitutional manner in violation of Article I, Section I, Paragraph 2 of the Georgia Constitution and the Equal Protection Clause of the Fourteenth Amendment to the United States Constitution. Finally, a denial or a conditional approval of the Application (with conditions not expressly approved by Applicant) would constitute a gross abuse of discretion and an unconstitutional violation Applicant's rights to

RETEL Services

Zoning Division  
Community Development Agency  
Cobb County, Georgia  
September 12, 2013  
Page 5

Applicant respectfully request that the Division recommend the approval of the Application to the Board for consideration at the next available public hearing.

We are happy to answer any questions or provide any information that the Division, its consultant or the Board may have with regard to the Application.

Sincerely,



Kathy Kelly-Jacobs

EWS/ews  
Enclosures

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substantive and procedural due process as guaranteed by the Georgia Constitution (*see Ga. Const. 1983, Art. I, § 1, para. 1*) and the Fifth and Fourteenth Amendments of the United States Constitution (*see U.S. Const. Amend. 5 and 14*). Applicant further challenges the constitutionality and enforceability of the Zoning Ordinance for lack of objective standards, guidelines or criteria limiting the Board's discretion in deciding applications for SLUP.

Furthermore, the Telecommunications Act of 1996, codified at 47 U.S.C. § 332(c) (the "**1996 TCA**") was intended to "promote competition and reduce regulation in order to secure lower prices and higher quality services for American telecommunications consumers and encourage the rapid deployment of new telecommunications technologies." *Preamble to 1996 TCA*. The primary mechanisms used by the 1996 TCA to "promote competition and reduce regulation" are prohibitions against local regulations that (i) "unreasonably discriminate among providers of functionally equivalent services" or (ii) "prohibit or have the effect of prohibiting the provision of personal wireless services." 47 U.S.C. § 332(c)(7)(B). Also, section 253 of the 1996 TCA provides that "no State or local statute or regulation ...may prohibit or have the effect of prohibiting the ability of any entity to provide any interstate or intrastate telecommunications service." The Board may violate the 1996 TCA on all three grounds if it denies the Application. Nevertheless, Applicant remains optimistic that the Board's consideration of the Application will be conducted in a constitutional and legal manner.

SLUP-12 (2013)  
Compound  
Layout

REV	DATE	RECORD OF ISSUE BY DATE
A	07/24/13	PRELIMINARY ISSUE [Signature] 10/20/13
0	08/04/13	CONSTRUCTION ISSUE [Signature] 11/08/13



SITE NAME:  
**HURT RD**

SITE NUMBER:  
**GA1001**

SITE ADDRESS:  
**WILDWOOD DRIVE  
MARIETTA, GA 30060**

COMPOUND  
LAYOUT

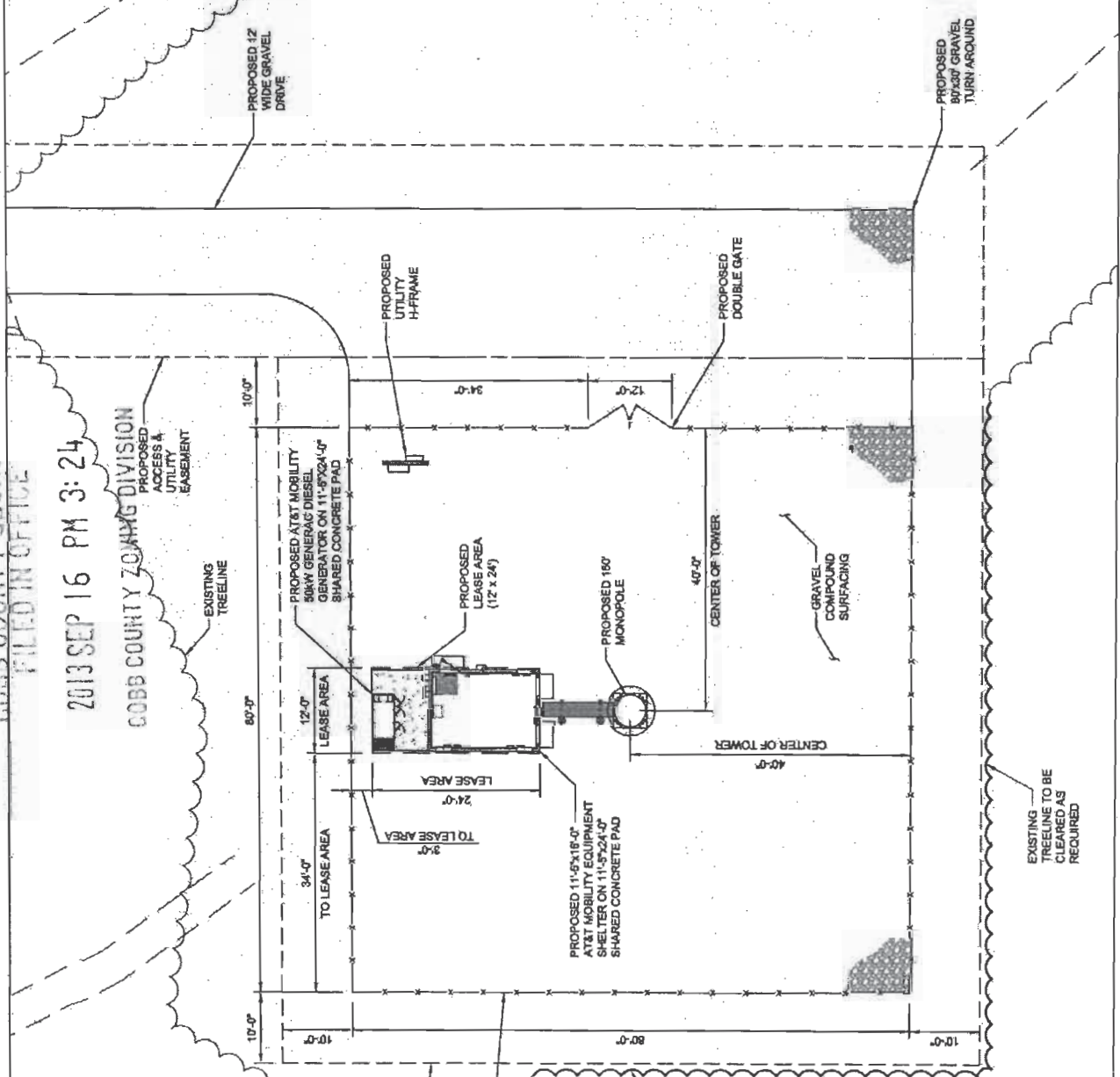
DRAWN BY:

CHECKED BY:

PROJECT MANAGER:

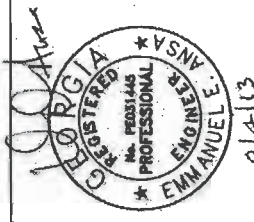
SHEET NUMBER:

COBB COUNTY GEORGIA  
FILED IN OFFICE  
2013 SEP 16 PM 3:24  
COBB COUNTY ZONING DIVISION  
PROPOSED ACCESS & UTILITY EASEMENT





REV	DATE	RECORD OF ISSUE BY	CHK
A	07/24/13	PRELIMINARY ISSUE	EMM
B	08/01/13	CONSTRUCTION ISSUE	EMM



9/4/13  
NEXT TOWER FOR CONSTRUCTION UNDER CONSTRUCTION AND 3 MONTHS

**SITE NAME:**  
HURT RD

**SITE NUMBER:**  
GA1001

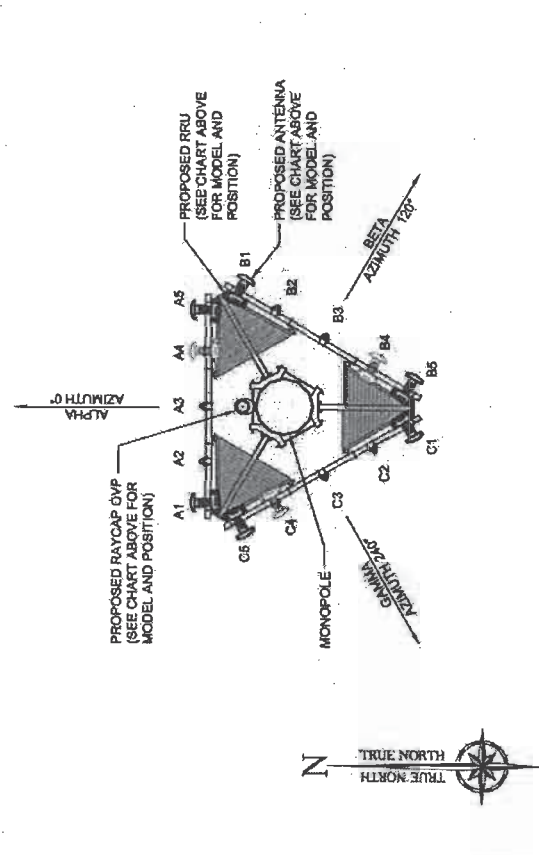
**SITE ADDRESS:**  
WILDWOOD DRIVE  
MARIETTA, GA 30090

**TOWER ELEVATION & ANTENNA PLAN**

**DRAWN BY:** DW  
**CHECKED BY:** MD  
**PROJECT MANAGER:** EB  
**SHEET NUMBER:** C

ANTENNA SCHEDULE			
POS.	AZIMUTH	ANTENNA MODEL	RRU MODEL
A1	0°	ERICSSON - KR011800S-1	(2) ERICSSON - LTE RRU-11
A2	0°	-	-
A3	0°	-	-
A4	0°	ERICSSON - KR011800S-2 (FUTURE)	(2) ERICSSON - WCDMA LTE RRU-11 (FUTURE)
A5	0°	KATHREIN - 8001076K	(4) ERICSSON - UMTS RRU-11
B1	120°	ERICSSON - KR011800S-1	(2) ERICSSON - LTE RRU-11
B2	120°	-	-
B3	300°	-	-
B4	120°	ERICSSON - KR011800S-2 (FUTURE)	(2) ERICSSON - WCDMA LTE RRU-11 (FUTURE)
B5	120°	KATHREIN - 8001076K	(4) ERICSSON - UMTS RRU-11
C1	240°	ERICSSON - KR011800S-1	(2) ERICSSON - LTE RRU-11
C2	240°	-	-
C3	240°	-	-
C4	240°	ERICSSON - KR011800S-2 (FUTURE)	(2) ERICSSON - WCDMA LTE RRU-11 (FUTURE)
C5	240°	KATHREIN - 8001076K	(4) ERICSSON - UMTS RRU-11

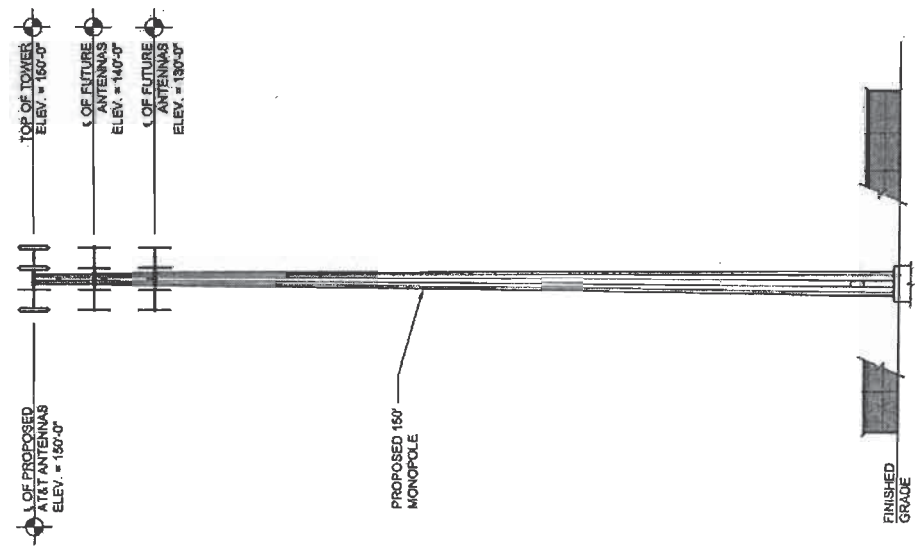
2 TOWER LOADING CHART



3 ANTENNA PLAN

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TOWER AND FOUNDATION DESIGN BY OTHERS

1 TOWER ELEVATION

SCALE: N.T.S.

SCALE: N.T.S.

SCALE: N.T.S.





660 Hemphill  
Ste 120  
Roswell, GA

SLUP-12 (2013)  
AT&T RF  
Affidavit, Maps &  
Site to Site  
Distance Chart

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# RF Affidavit

**To:** Whom it may concern  
**From:** AT&T Mobility RF Engineer, Lanre Ogun  
**Date:** 9/5/2013  
**Re:** GAATU2481/GNL02481

AT&T is requesting permission to construct a new wireless telecommunications tower at *Wildwood Drive, Marietta, GA 30060* as part of a plan to improve wireless, voice and data service to the *Cobb* county area. Site is needed to improve coverage on Ivory Trail, Clearview Drive, Brooks Court, Lilla In, Harris Rd, Maxwell Drive which is the greater Marietta area.

RF Propagation plots are attached showing predicted before and after coverage levels. The attached snapshots show the pre and post coverage for the area affected.

Extensive site acquisition efforts were conducted to determine if collocation on an existing tower or other structure would be possible, and no adequate structure could be found. There are no structures in the area that could provide the required mounting height of *150ft* or more and support the load of the antennas, lines, and related apparatus needed for AT&T to deploy its UMTS and LTE equipment, thus no alternative to the construction of a new tower exists. The location for the new tower was selected based upon a comprehensive analysis of the search ring. Factors included: aesthetic impact, compatibility with existing land use, constructability, suitability to meet RF propagation objectives, willingness of landowner to lease land, etc.

The closest existing AT&T sites that would hand off to this proposed site are on average more than a mile away from the needed coverage zone, and there are no existing towers within 4500 feet of the proposed tower location.

AT&T certifies that all of its equipment will be installed and operated in keeping with applicable FAA and FCC rules and regulations and appropriate industry standards. The construction of this tower, including AT&T's installation of transmitter/receiver equipment, will not interfere with the usual and customary transmission or reception of radio, television, etc service enjoyed by adjacent properties. AT&T further certifies that the proposed antennas will not cause interference with other telecommunications devices, including the *Cobb* County Public Communications System.

AT&T further certifies that the proposed telecommunications facility shall be maintained in a safe manner, and in compliance with all conditions of the telecommunications permit, without exception, unless specifically granted relief by the Board of Commissioners of *Cobb* County in writing, as well as all applicable and permissible local codes, ordinances and regulations, including any and all applicable county, state and federal laws, rules and regulations.

Should you need additional information, please contact me at the following number, (770) 708-0525.

Respectfully,

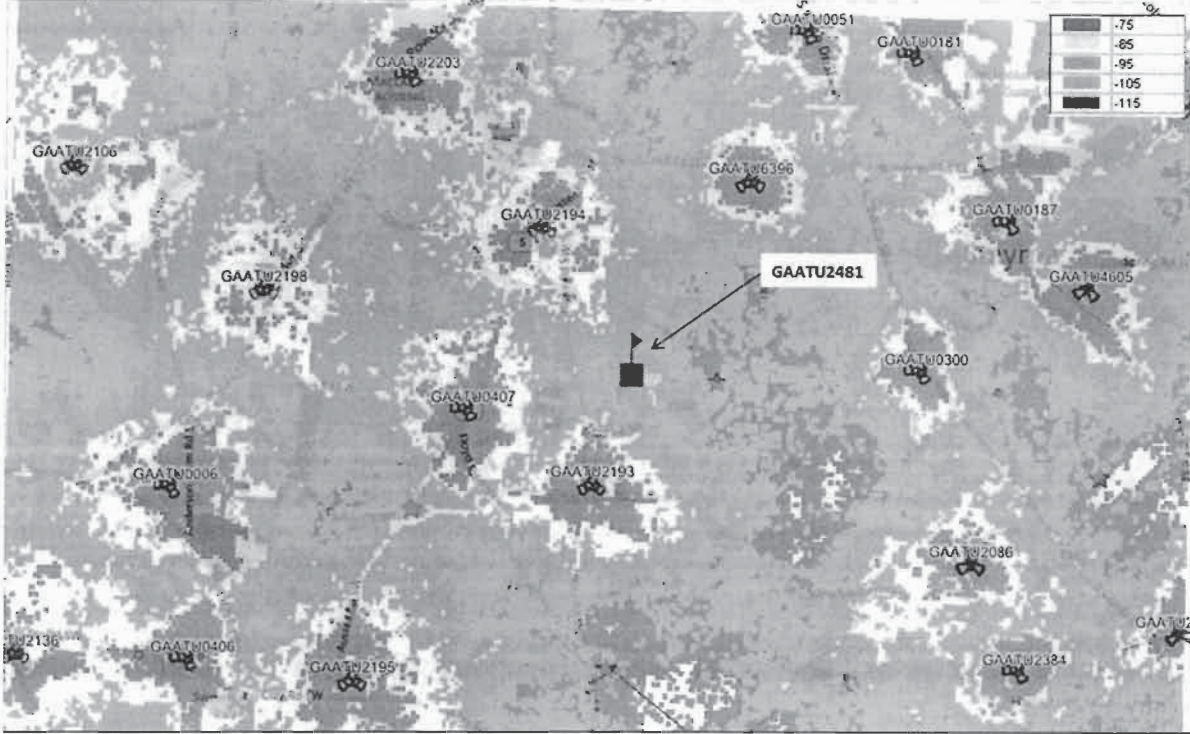
Lanre Ogun  
AT&T Mobility



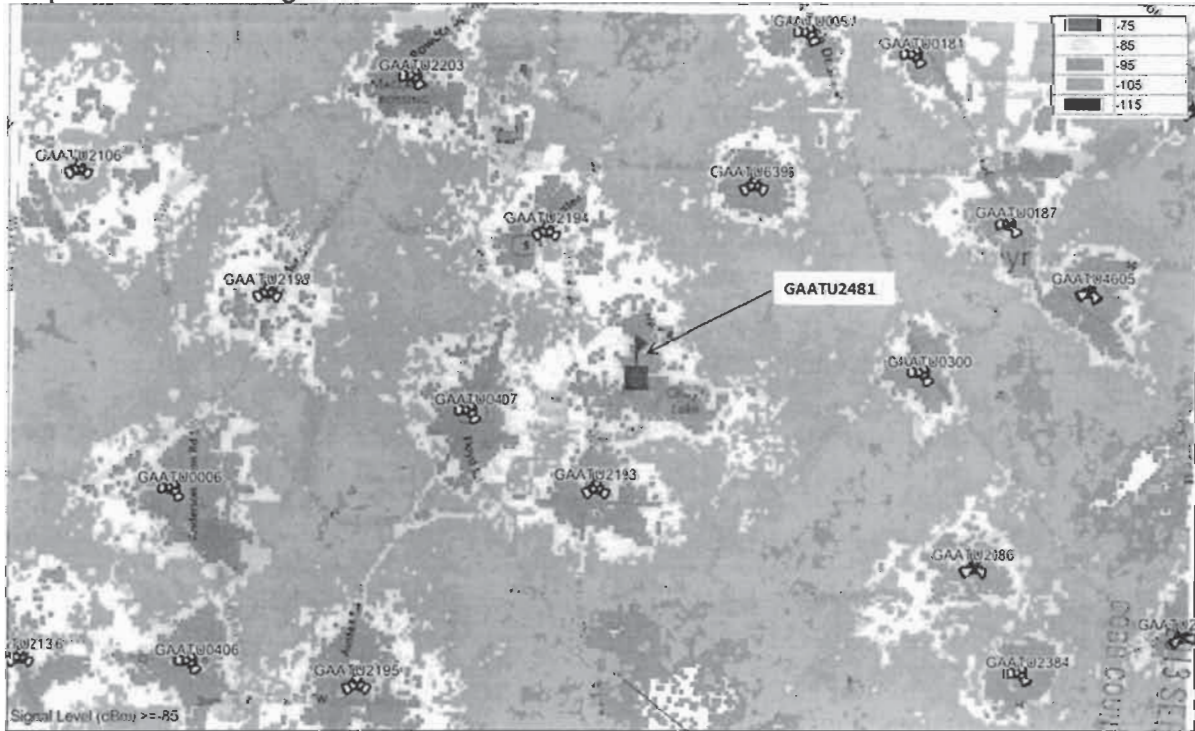
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Ste 120  
Roswell, GA

SLUP-12 (2013)  
AT&T RF  
Affidavit, Maps &  
Site to Site  
Distance Chart

Existing AT&T Coverage



Proposed AT&T Coverage with Planned Site



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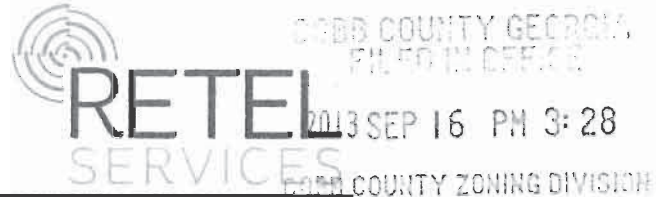
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Roswell, GA

SLUP-12 (2013)  
AT&T RF  
Affidavit, Maps &  
Site to Site  
Distance Chart

Site to Site Distance from the Proposed to the Existing Macro Sites

Site ID	LONG	LAT	Height(feet)	Distance from GA2481	County	Status
GAATU2481	-84.5703	33.87278	150	0.0	COBB	Proposed
GAATU2193	-84.576	33.8582	150	1.0	COBB	Existing
GAATU2194	-84.5833	33.88792	182	1.3	COBB	Existing
GAATU0407	-84.5941	33.8671	136	1.4	COBB	Existing
GAATU6396	-84.5537	33.8932	121	1.7	COBB	Existing
GAATU0300	-84.5296	33.8715	130	2.3	COBB	Existing
GAATU2086	-84.5221	33.84903	150	3.2	COBB	Existing

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5781 Glenridge Drive NE  
Suite 110  
Atlanta, GA 30328

**Re: Application For Special Land Use Permit**  
**Applicant:** RETEL Brokerage Services, Inc.  
**Property:** 448 Hurt Road, Smyrna, Cobb County, Georgia (Wildwood Drive)

**ANALYSIS OF ZONING STANDARDS IN SUPPORT OF RETEL BROKERAGE SERVICES, INC.'S SLUP APPLICATION**

Section 134-37(e) of the Zoning Ordinance<sup>1</sup> requires the Board to consider fifteen guideposts, at a minimum, when deciding whether to grant or deny a SLUP application. Applying the fifteen guideposts to the Application shows that the Board should GRANT the Application.

**(1) Whether or not there will be a significant adverse effect on the neighborhood or area in which the proposed use will be located.**

If the Board's decision is to grant the Application, then there will by no means be any significant adverse impact on the neighborhood or area in which the proposed Facility will be located. In this case, the Facility will be tucked away in the heavily treed and forested area of the Property, visible only at a glimpse by neighboring property owners, as more particularly shown on the attached photo simulations. Additionally, a number of contiguous property owners and area neighbors have indicated their support for (or no objection to) the Application, including many immediately adjacent neighbors who are the closest to the Property. Furthermore, the location of the Facility on the Site meets the "design, location and safety requirements" described in Section 134-273(3) of the Zoning Ordinance, in that although the Property is zoned for single family use, there is an existing horse farm and boarding operation on the Property which is non residential in nature and because the Property is not located within a platted or existing subdivision. Accordingly, the Board's approval of the Application will further the goals of the Zoning Ordinance and not significantly adversely affect the neighborhood or surrounding area.

Importantly, Applicant notes that a number of immediately adjacent neighbors have signed the County's Consent of Contiguous Property Owners form evidencing that they have given consent to and have no objection to this Application.

If the Board decides to reject the Application, Applicant (and AT&T and T-Mobile) will be forced to renew their search for property on which it may locate the proposed Facility. Given that the surrounding area is virtually entirely zoned and used for residential purposes, it is an almost certainty that at some point, a facility on a residentially zoned property along Hurt Road will be the alternative. Likewise, Applicant's inability to locate the Facility on the Site may force Applicant to construct more than one tower in the area to allow it to provide the same coverage to AT&T and T-Mobile as it could achieve with the proposed Facility. Multiple towers, including the potential of one or more located on

<sup>1</sup>Capitalized terms not otherwise defined in this Analysis shall have the meanings ascribed to them in the Statement submitted by RETEL Brokerage Services, Inc. with its Application.

**(7) Whether or not the site or intensity of the use is appropriate.**

As described in the Statement and above, the Site is appropriate for the location of the proposed Facility. The location and operation of the Facility on the Property will not significantly alter the intensity of the use of the Property. Instead, the revenue generated by the location of the Facility will help ensure that the Owner will not seek to sell off and subdivide the Property for a new subdivision (which would generate significantly more traffic and ultimately be a more intense use of the Property – all allowable under the current R-20 zoning).

**(8) Whether or not special or unique conditions overcome the Board's general presumption that residential neighborhoods should not allow noncompatible business uses.**

In this instance, the fact that the Property is currently operating as a horse farm and not a single family residence (or series of single family residences as 84 acres would support a significantly increased amount of improvements), is a special and unique condition supporting the location of the Facility on the Property. As set forth above, the fact that there are neighborhoods which are adjacent, but of which the Property is not a part of, also is a condition that overcomes the Board's general presumption that a wireless facility is a "noncompatible" business use of the Property. Similarly, characteristics of wireless communications facilities operations including the post-construction operations and maintenance of the Facility and the negligible impact on the area in terms of traffic and water/sewer use are sufficient to distinguish the wireless use from "noncompatible business uses" and reflect that the Board's general presumption regarding business uses is inapplicable to wireless telecommunications facilities in general. Finally, as evidenced by the Consent of Contiguous Occupants or Land Owners form filed with the Application, a number of residents adjacent to the Property support or have no objection to the Application.

**(9) Whether or not adequate provisions are made regarding hours of operation.**

As indicated above and in the Statement, once constructed, the Facility will be unmanned, and Applicant anticipates only monthly visits by a carrier's maintenance technician to the Facility. Although the Facility will operate constantly, there will be no visible or tangible impact of such continuous operation on the existing and surrounding uses. Accordingly, Applicant has made adequate provisions regarding hours of operation.

**(10) Whether or not adequate controls and limits are placed on commercial and business deliveries.**

During construction of the Facility, which is a 2 or 3 week period, there will be some deliveries made to the Property, but thereafter there will be infrequent visits and virtually no commercial or business deliveries to the Site.

**(11) Whether or not adequate landscape plans are incorporated to ensure appropriate transition.**

Given the location of the Facility within a heavily wooded area of the Property, installing landscaping around the Site would not be a transition, but rather would be out of place and provide no further shield or buffer to screen the Site. That said, Applicant can incorporate a landscape plan as needed, but respectfully suggests that it is not warranted in this situation.

**(12) Whether or not the public health, safety, welfare or moral concerns of the surrounding neighborhood will be adversely affected.**

This factor simply is not relevant to the proposed location of the Facility.

**(13) Whether the Application complies with any applicable specific requirements set forth in this chapter for special land use permits for particular types of uses.**

The Application complies with all specific requirements set forth in the Zoning Ordinance for SLUPs for telecommunications towers. Specifically, Zoning Ordinance Section 134-273(3)(m)(l) identifies six specific factors that the Board is to consider with respect to the issuance of SLUPs for towers. In this instance, consideration of all of these factors weigh in support of granting the Application.

First, with respect to the proximity of the tower to offsite residential structures and areas, as shown on the Overall Site Layout (sheet C-1 of the Site Plans) reflects that the location of the Facility on the Site and indeed on the Property will ensure that no off-site residential structure or area is physically impacted by the Facility. Instead, this Facility on the Site has the benefit of being close enough to provide service to offsite residential structures while impacting them as little as possible physically. As shown on the photo simulations attached, a portion of the Facility will be visible, but it will be unobtrusive and generally blend into the existing tree line.

Second, as discussed in item (5) above, this Facility is not anticipated to have any effect on property owners or purchaser's of nearby or adjacent residentially zoned areas.

Third, the tree line surrounding the Site is substantial and filled with mature trees which are on average 80-90 feet tall. There is also significant underbrush that serves as a screen of the fencing and ground equipment surrounding the Site.

There are no substantially tall structures on the Property or in the surrounding area (which presents a challenge for collocation opportunities). As depicted on the attached photo simulations, only the very top portion of the Facility will be visible from areas around the Property.

Fifth, the aesthetic design of the tower is a monopole which will be a light gray/steel color generally with antenna arrays at the top location. The tower will not have guyed wires or a lattice style (both typically viewed as more visually intrusive), and it will be consistent with utility poles.

Finally, although the surrounding views are typically of trees and residential structures, there are intervening telephone and other utility structures in the area. This should be no different. The height of the tower is minimal – 150 feet, and the style of the tower itself is designed to be as visually unobtrusive against the existing visual backdrop.

**(14) Whether the Applicant has provided sufficient information to allow a full consideration of all relevant factors.**

In support of its Application, Applicant has provided all information required by the Zoning Ordinance. Applicant remains willing to provide to the Board any additional information that it may desire to allow for a full consideration of the Application.

**(15) In all applications for a special land use permit the burden shall be on the applicant both to produce sufficient information to allow the county fully to consider all relevant factors and to demonstrate that the proposal complies with all applicable requirements and is otherwise consistent with the policies reflected in the factors enumerated in this chapter for consideration by the county.**

In addition to this Zoning Analysis, Applicant has submitted the following in support of Application:

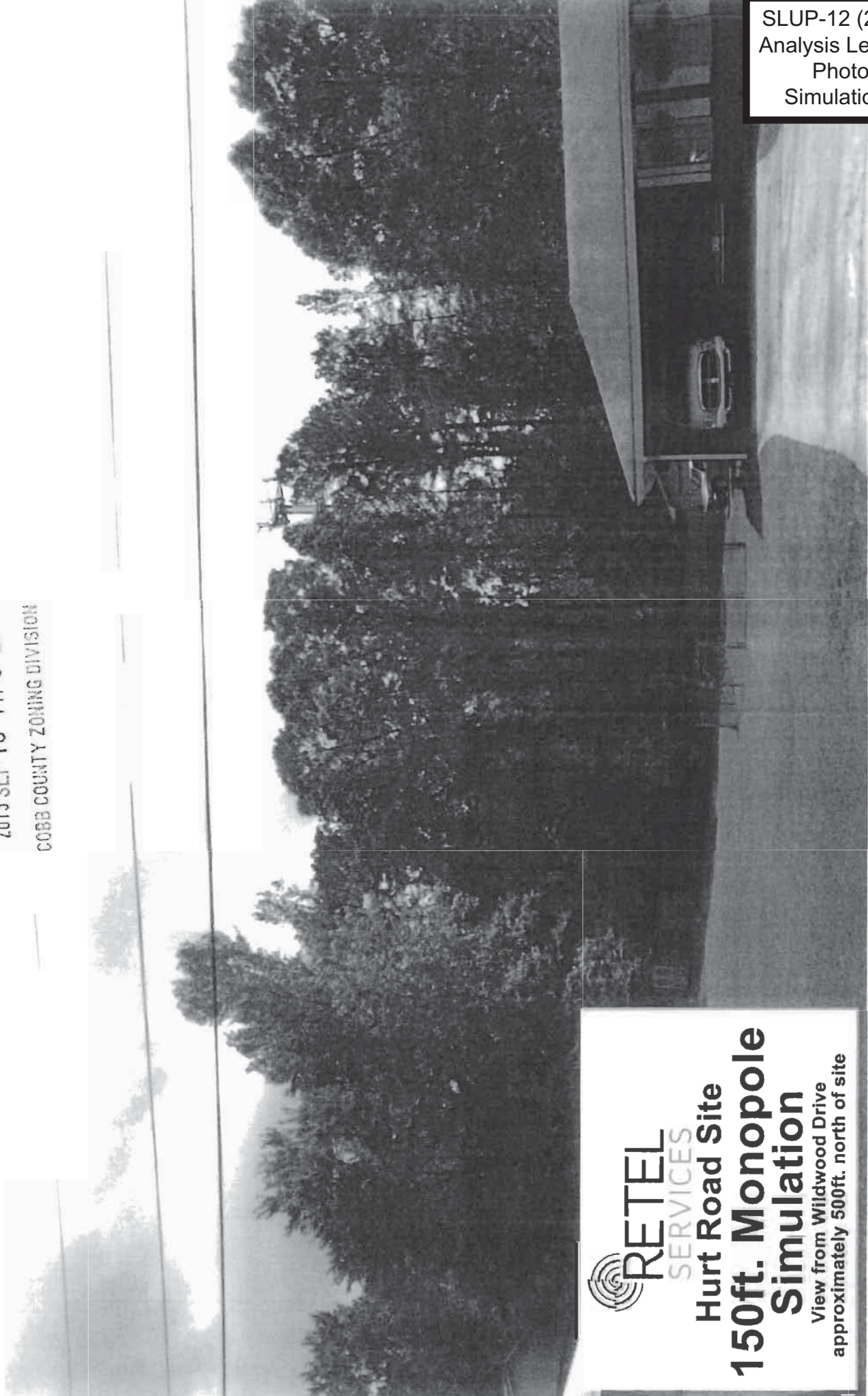
- (a) Application for Special Land Use Permit, Cobb County Georgia form, including original notarized signature of Owner and Applicant's representatives;
- (b) a copy of the Property warranty deed to Owner;
- (c) metes and Bounds legal descriptions;
- (d) copy of the paid tax receipt for the Property;
- (e) the Statement;
- (f) Site Plans (including survey and scaled elevation drawing of proposed tower);
- (g) RF Engineer's Analysis from AT&T and T-Mobile;
- (h) Documentation of all towers within a three-mile radius of the proposed Facility (per Zoning Ordinance Section 134-273(3)(m));
- (i) Application and Consultant Fees (\$6,000.00); and
- (j) Sign Deposit and Fees (\$345.00).

Based on all of these factors, Applicant has produced sufficient information to allow the Board fully to consider all relevant factors and to demonstrate that the Application complies with all applicable requirements and is otherwise consistent with the policies reflected in the factors enumerated in this chapter for consideration by Cobb County. The Board should APPROVE the Application.

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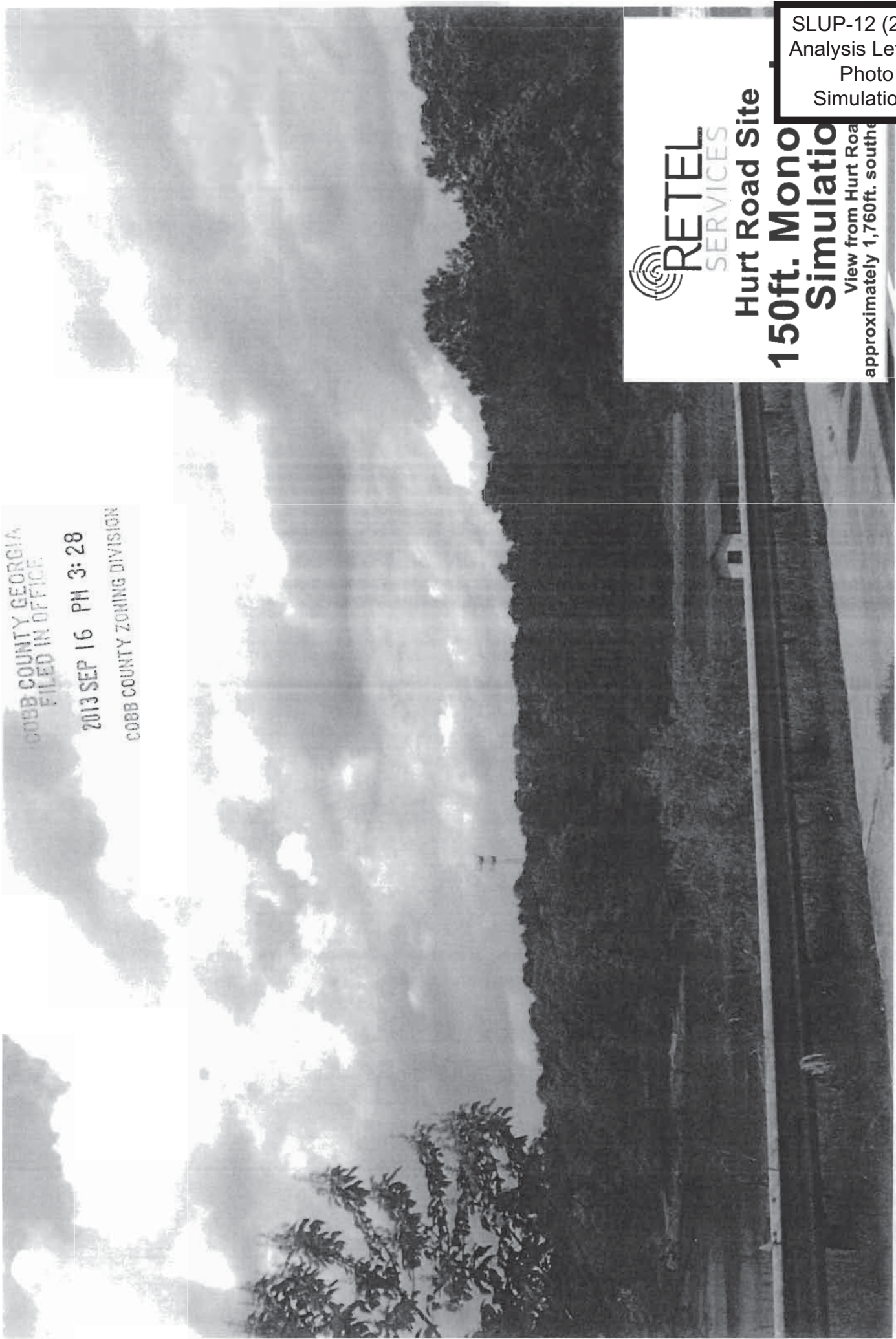
COBB COUNTY ZONING DIVISION



**RETEL**  
SERVICES  
**Hurt Road Site**  
**150ft. Monopole**  
**Simulation**  
View from Wildwood Drive  
approximately 500ft. north of site



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Hurt Road Site

# 150ft. Mono Simulation

View from Hurt Road  
approximately 1,760ft. southe

SLUP-12 (2013)  
Analysis Letter &  
Photo  
Simulations

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Hurt Road Site

150ft. Mono  
Simulation

View from Mill Stream  
approximately 560ft. wes

SLUP-12 (2013)  
Analysis Letter &  
Photo  
Simulations



**State of Georgia**  
**Telecommunications Site Review**  
**New Support Structure**

**CityScape**

Consultants, Inc.  
7050 West Palmetto Park Road #15-63  
Boca Raton, FL 33433  
Tel: 877.438-2851 Fax: 877.220-4593

SLUP-12  
(2013)  
Consultant's  
Report

November 18, 2013

Mr. John Pederson  
Cobb County Zoning Division Manager  
191 Lawrence Street, Suite 300  
Marietta, GA 30060

**RE: Retel Services Application**  
**(AT&T Mobility, T-Mobile Wireless, Verizon Wireless)**

Dear Mr. Pederson,

At your request on behalf of Cobb County, Georgia, CityScape Consultants, in its capacity as telecommunications consultant for the County, has considered the merits of an application submitted by Retel Service on behalf of AT&T Mobility, T-Mobile Wireless and Verizon Wireless ("Carriers") to construct a new one hundred fifty-four (154) foot Monopole type tower. The facility is intended to accommodate the antennas of up to three (3) wireless service providers, see *figure 1*. The proposed facility will be owned by Retel Services and is located on Wildwood Drive near Marietta in Cobb County, Georgia, see *figure 2*.

This application for a new antenna support structure was intended to initially supply antenna space for AT&T Mobility. Then interest followed by a letter of interest from T-Mobile Wireless. On October 22<sup>nd</sup> Cityscape was informed that Verizon has been included as a third applicant. The facility as designed will be full. AT&T is in the process of developing approximately 46,000 new facilities during a current build cycle. Verizon has indicated an increase in new construction and CityScape has seen an increase by this carrier nationwide and now confirmed by being included at this location. T-Mobile has merged with MetroPCS and Sprint/Nextel has recently been provided \$3.6 billion dollars for capital improvements. There is no shortage of upcoming growth in the personal wireless industry. The public wants this service, the federal government has written new legislation to limit local control and the federal government along with the state of Georgia is proposing new laws to further limit any local jurisdictional control.

The Carriers and most other service providers intend to improve reliability of their general service and to upgrade their facilities for advancing technologies. While much of the proposed growth is to continue to meet the carrier mandates of providing emergency services to the public the unprecedented explosion of smartphones is a greater reason for the current level of growth. The fourth generation (4G) of personal wireless services is directed toward the Android, iPhone, iPad, Galaxy and other higher speed smartphone devices. The intent of this application is to provide new and improved services into neighborhoods and places of residence. The future growth in personal wireless services is directed toward the homes and apartments. Most areas around traveled roadways and commercial areas have coverage, but only about ½ of the requirements over the next decade. Neighborhoods are the increasing areas of demand. The next generation of wireless services will bring high speed communications for computers and will allow direct access to entertainment sources from cell towers to radio and television and many other applications.

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Cobb County's current wireless infrastructure is approximately 40% to 45% developed. The future implementation of wireless services will require more sites. The wireless industry has grown at more than 20% over the last 2 decades and that level will continue for no less than another decade. Virtually all aspects of an individual's life are developing into fingertip applications via wireless networks. The major difference is that the overwhelming majority of new locations must be in the reach of the general public and where they live. Currently all cellular type service is spotty in most locations in the County and to some extent in the surrounding counties. AT&T, T-Mobile and Verizon lead the industry, and soon to follow will be the other major carriers, plus it is expected that there will be many new start-up operators bringing high speed wireless broadband. Some such as Clearwire, Cricket, Cox, Comcast, Next-X, Net Zero, Dish Network, and Hughes have already begun and there will be more.

This application is from Retel Services who assists the personal wireless carriers with locating and developing facilities. Retel is not qualified under federal or state laws for any special consideration or protected oversight. AT&T, T-Mobile and Verizon as personal wireless providers are afforded the special considerations. CityScape's review is based on the County's obligations under federal and state law regarding these three Carriers. Their submittals meet the requirements of the ordinance with limited exceptions.

Making a qualified determination for proof of need for a new wireless facility requires an understanding of the current conditions along with the projected network deployment concepts and the County's obligations under law. From this information and experience CityScape can offer an opinion and recommendations as to the validity of this application.

A reasonable search area location is a key element in assuring that a site is justified. Generally, new wireless communication facilities are equally spaced with respect to existing sites. However, terrain, network capacity and other issues may necessitate a facility that it is *not* equally spaced with respect to existing sites. AT&T did provide a search ring, see *figure 3*; and that was sufficient to justify the need for a new facility in the general area; no other Carrier's search Ring was necessary. The proposed site is 3,600 feet at 284.9 degrees from the AT&T search ring center, see *figure 4*.

All three Carriers provided supporting documentation. First considered will be AT&T Mobility. As stated above AT&T's Search Ring was used to support the need of a new structure in the general area. In *figure 5* AT&T shows their current service level; following in *figure 6* is AT&T's projected upgrade. T-Mobile, which will include the facilities of MetroPCS shows their current service level in *figure 7* followed by the projected improvement in *figure 8*. Lastly Verizon shows their current service in *figure 9* and the projected improvement in *figure 10*.

CityScape recognizes that Cobb County is now becoming a rapid growth area for improved wireless services. The County will be in need of more elevated support structures in the future to accommodate the six FCC licensed carriers. Additionally there will be more licensed and unlicensed carriers providing service in Cobb County. Both licensed and unlicensed operators are protected by the Federal Communications Commission, but all must utilize FCC type approved equipment.

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For this reason the County should consider requiring more than three (3) antenna arrays on each support structure. This application is for three (3) Carriers and is one hundred fifty-four (154) feet tall which could allow sufficient space on this structure for additional antenna arrays. Antenna positions on a support structure have limiting factors. Most are controlled by obstacles adjacent or in close proximity to the support structure; in this case trees. Generally the tree heights in northwest Georgia top out at 80 to 90 feet. For reasonable signal propagation personal wireless base station antennas are preferred to be at least ten (10) feet above tree top. At the proposed location antennas could be mounted as low as one hundred (100) feet on the tower. If the tower was designed for antenna arrays down to one hundred (100) feet there would be room for all six (6) of the licensed carriers operating in Cobb County. If the tower is limited to three (3) Carriers there will be need for an additional tower in the general area. The County is obligated to allow all licensed carriers to deploy their networks and in this area there will be a need for more than a single support structure at some time in the future. It is not uncommon for a County to ask a tower applicant to provide space for up to six (6) carriers.

CityScape knows that this facility will operate with various frequencies which could interfere with Public Safety radio operations. It is important that all applicants provide compliance statement. AT&T did provided such a statement of compliance with FCC rules regarding interference to other radio services, see *figure 11*. Retel Services did request a waiver of the buffer requirements for landscaping. This location is surrounded by existing vegetation common to the area and that is a reasonable request, but requires a County determination.

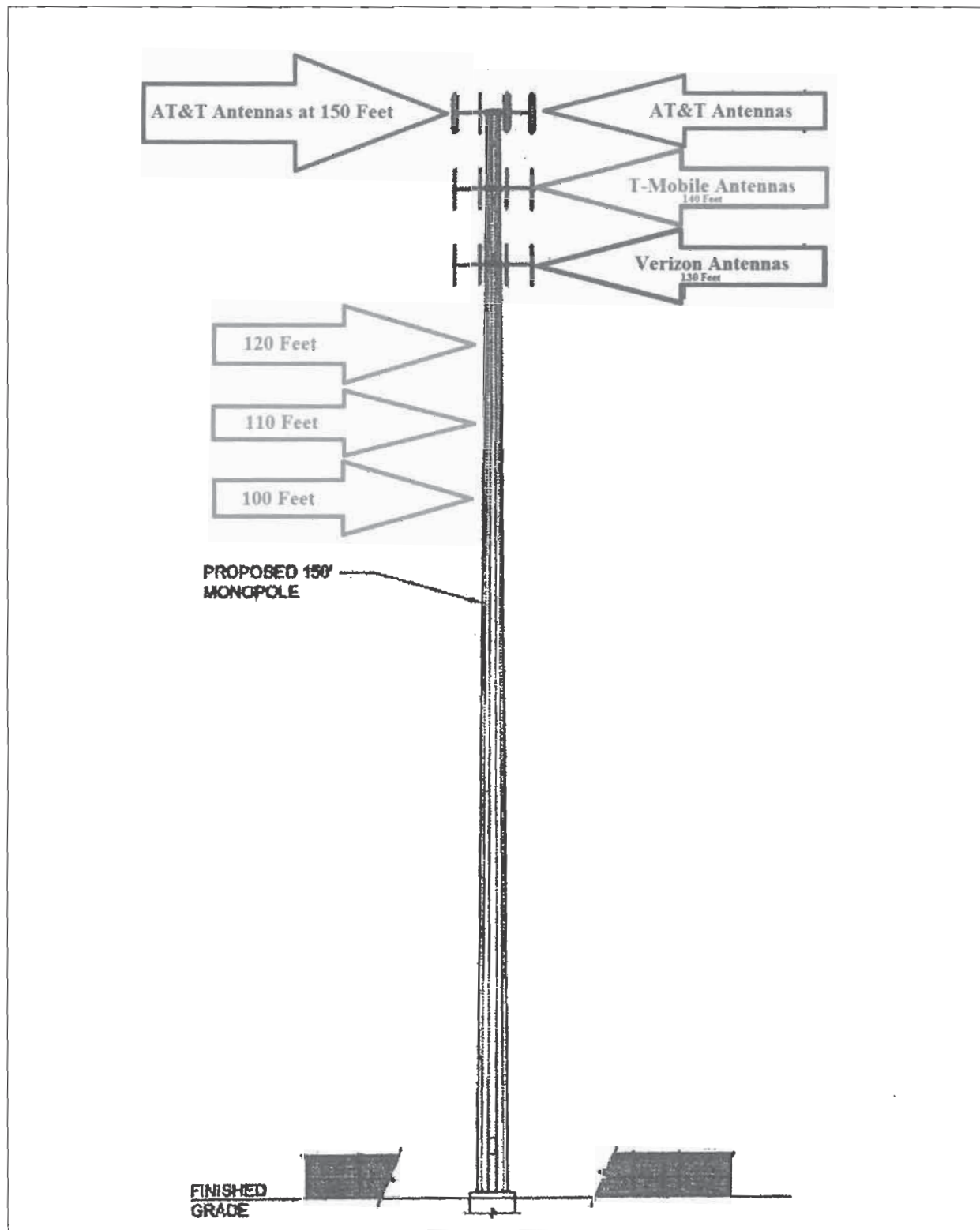
CityScape Consultants and the wireless expert for the County has determined the applicant (Retel Services) with the supporting documentation from the Carriers has met the threshold of evidence to support a new support structure and accommodating ground equipment and recommends approval with the following conditions:

1. The applicant shall design the facility to support up to six (6) carriers of like design; and,
2. The applicant shall provide satisfactory SHPO and NEPA documentation; and,
3. AT&T Mobility shall attest the emergency generators noise shall not exceed 70dB at the property boundaries; and,
4. AT&T Mobility shall attest the emergency generator shall be tested between the hours of 9AM and 4PM Monday through Friday only; and,
5. All antenna and feed line ports are to be sealed to prevent access by birds and other wildlife.

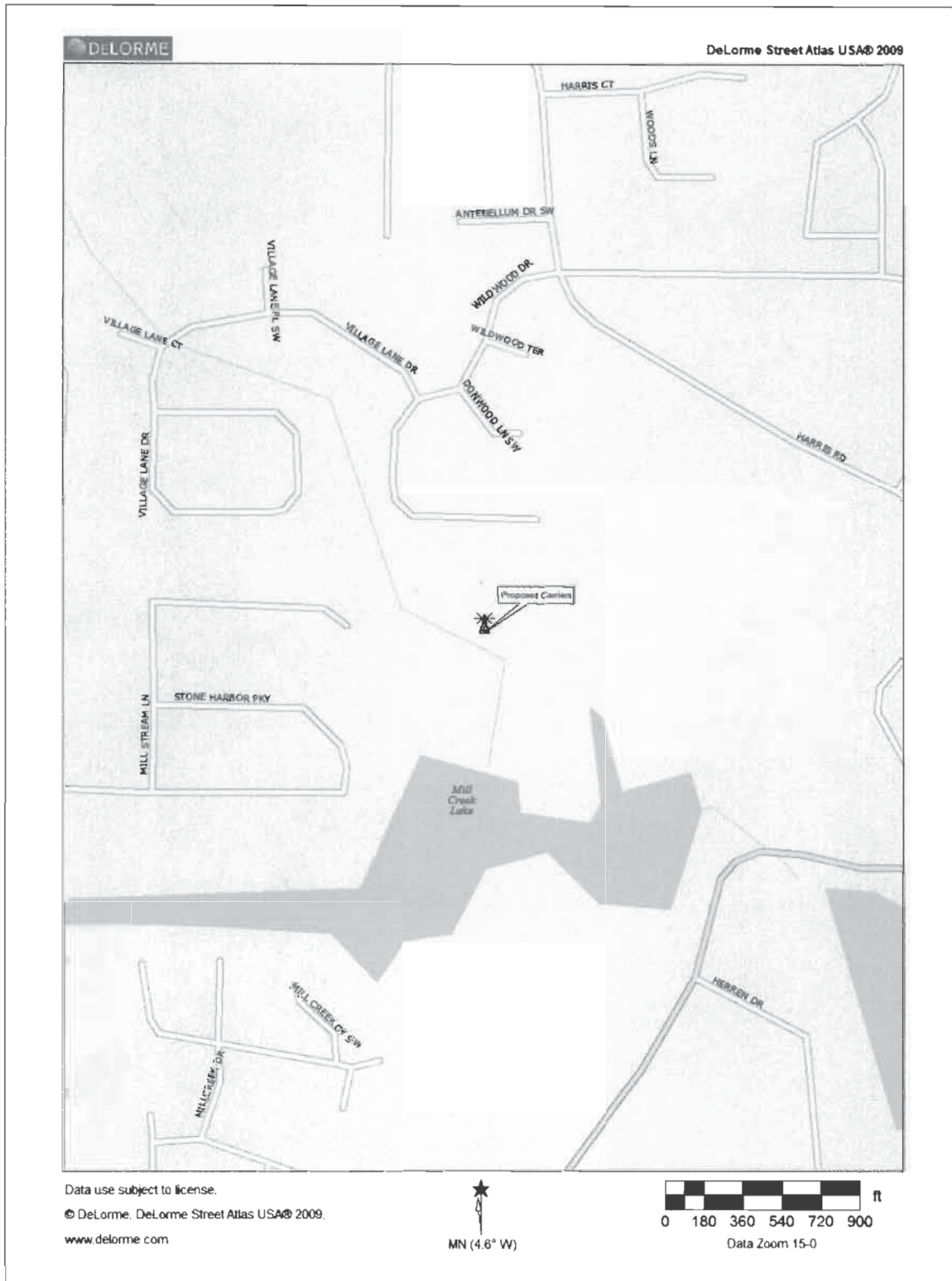
Respectfully submitted,



Richard L. Edwards  
FCC Licensed  
PCIA Certified  
CityScape Consultants, Inc.



**Figure 1. Proposed Support Structure Elevation Drawing**



**Figure 2. Facility Location**

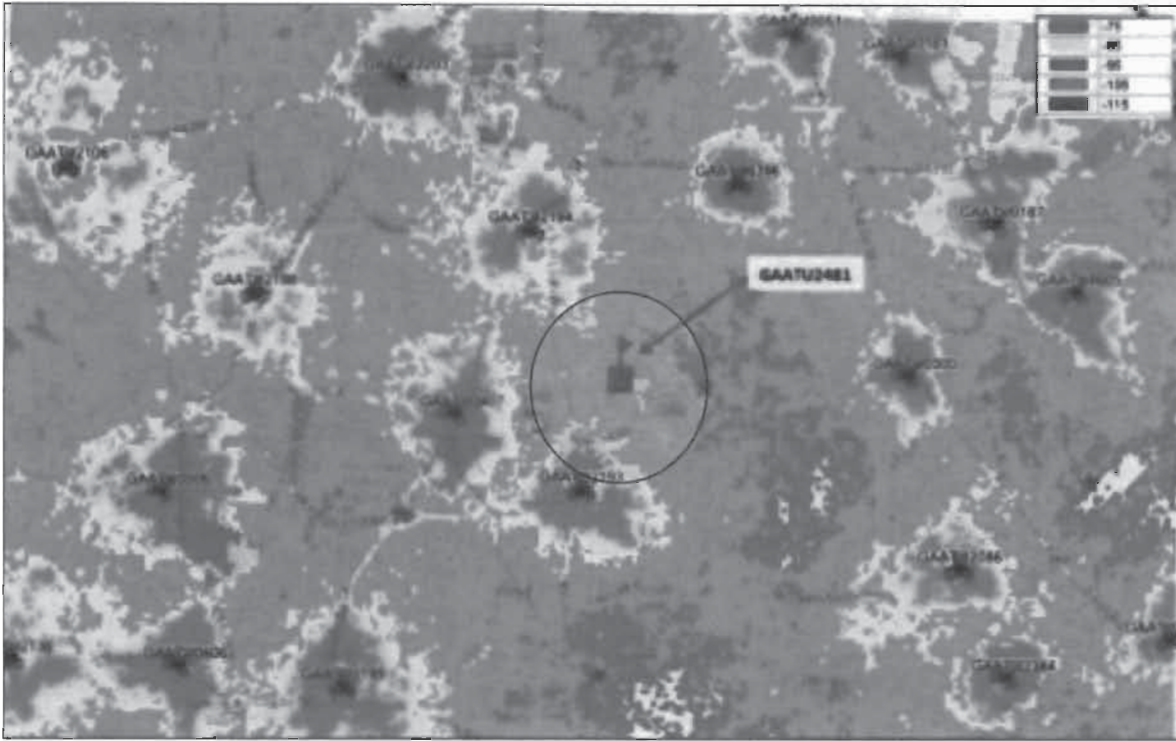


**Figure 3. AT&T Search Ring**

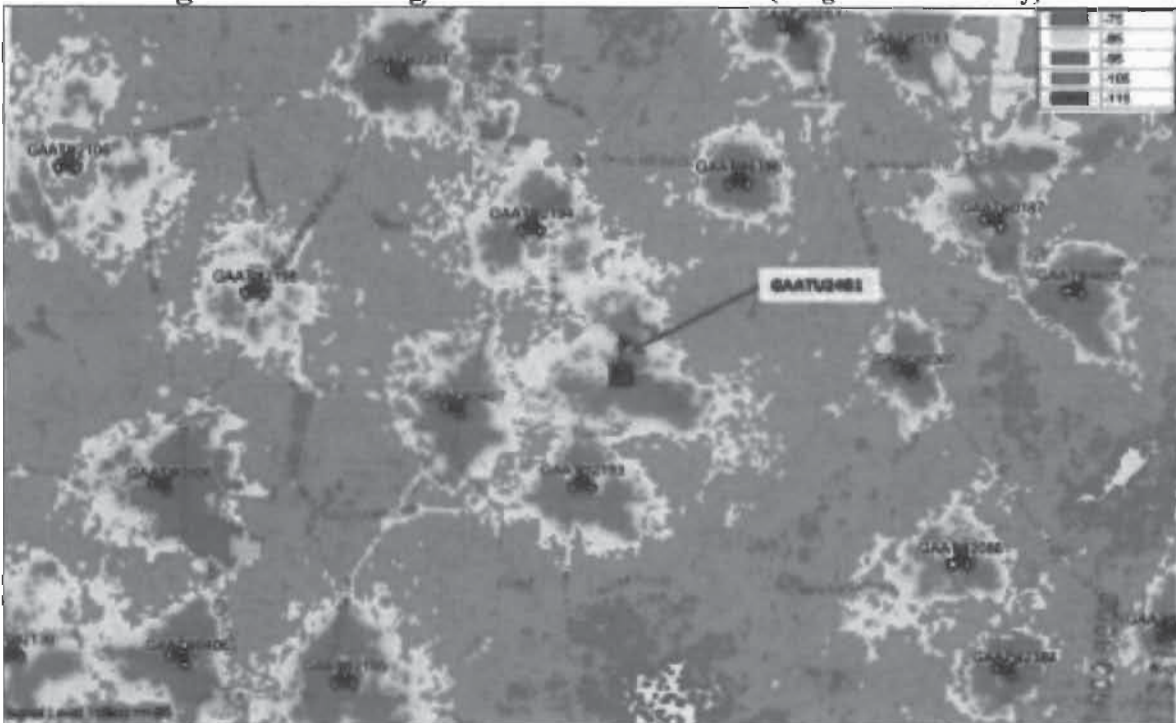




**Figure 4. Proposed Location Compared to AT&T Ring**



**Figure 5. Existing AT&T Service Area (Target Shown in Grey)**



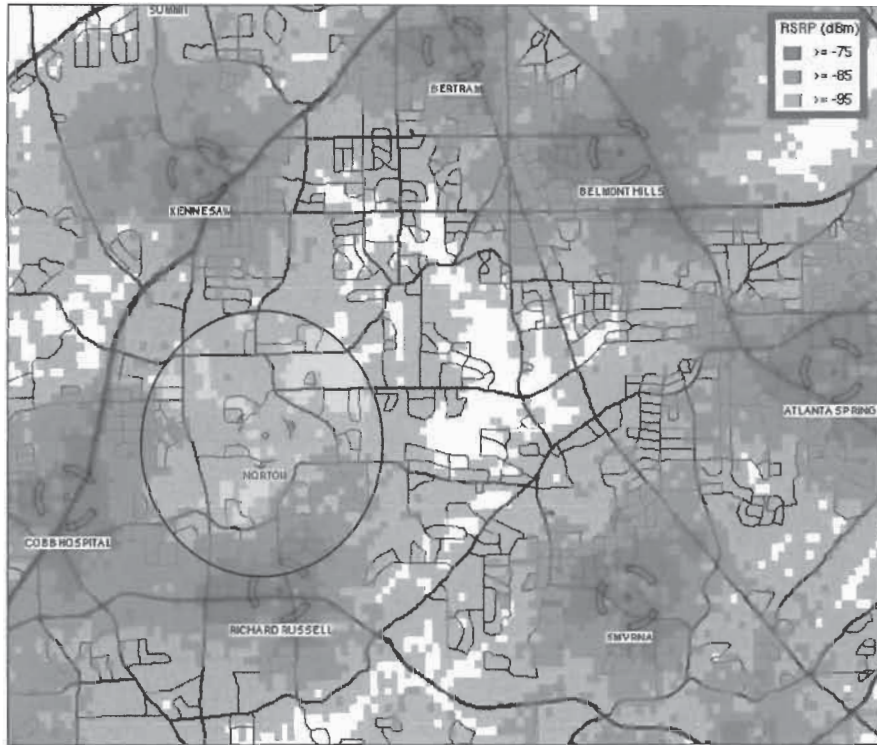
**Figure 6. Proposed AT&T Propagation**



**Figure 7. Existing T-Mobile Service (Target Shown in Grey)**



**Figure 8. Proposed T-Mobile Propagation**



**Figure 9. Existing Verizon Service (Target Shown in Grey)**



**Figure 10. Proposed Verizon Propagation**

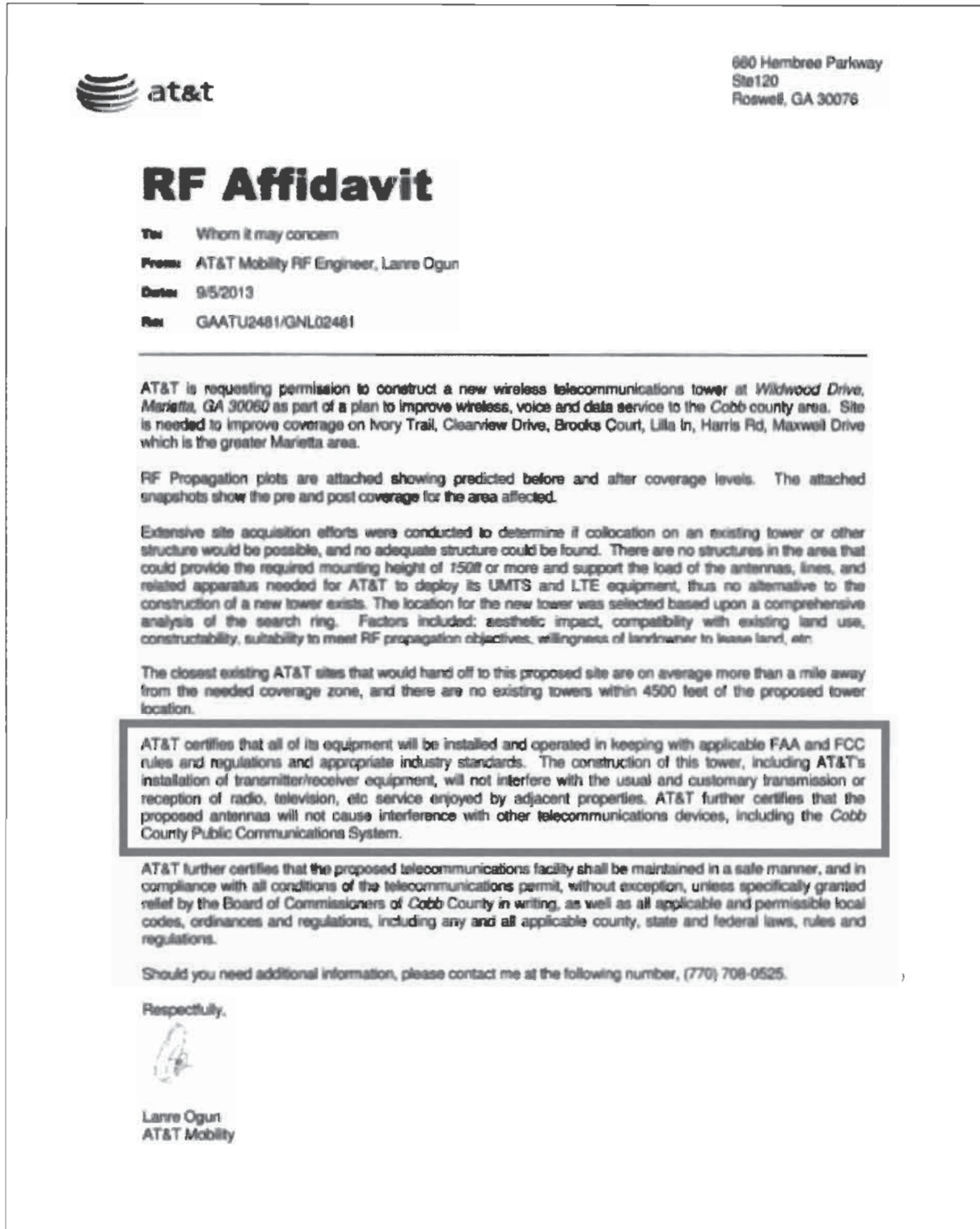


Figure 11. AT&T FCC Compliance



**Exhibit A. Photo Simulation**



**Exhibit B. Photo Simulation**



**Exhibit C. Photo Simulation**

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