



December 12, 2023
Job Number 2017748.70

Brenda Delbert
Director of Building and Planning
City of Wheeling
1500 Chapline Street
Wheeling, WV 26003

RE: AT&T Mobility – W047 Wheeling College
908 National Road
Wheeling, WV 26003

Dear Ms. Delbert,

GPD Group is in receipt of the review letter from Center for Municipal Solutions dated November 29, 2023. Below are our responses to that letter addressing the three incomplete items therein. The item numbers correspond with the items in the review letter from CMS.

4. Per §1363.08.j.17 Signed documentation such as the "Checklist to Determine Whether a Facility is Categorically Excluded," to verify the proposed Wireless Telecommunications Facility will be in full compliance with the current FCC RF Emissions guidelines (NIER) is required. If the site is not categorically excluded, a full RF Emissions study is required. The letter dated 3/25/21 from Joseph Spiecha, RF Engineer for AT&T, describes the RF Emissions policies of AT&T and not an RF Emissions compliance study.

The "Checklist to Determine Whether a Facility is Categorically Excluded," has been submitted but not signed. A signature on the "Checklist to Determine Whether a Facility is Categorically Excluded" is required. This item is INCOMPLETE.

Response: Please see the attached "Checklist to Determine Whether a Facility is Categorically Excluded" with signature.

6. Per §1363.08.k The applicant will provide a written copy of an analysis, completed by a qualified individual or organization, to determine if the proposed new Tower or existing structure intended to support wireless facilities is in compliance with Federal Aviation Administration Regulation Part 77 and if it requires lighting. This requirement shall also be for any existing structure or building where the application increases the height of the structure or building. If this analysis determines that an FAA determination is required, then all filings with the FAA, all responses from the FAA and any related correspondence shall be provided with the application. The statement in the zoning narrative will not satisfy this requirement.

We have reviewed your letter outlining the proposed tower's compliance with Federal Aviation Administration Regulation Part 77. This letter dated November 17, 2023, written by you requires your signature. This item is INCOMPLETE.

Response: Please see the attached written analysis with signature.

13. Per §1363.11 Propagation maps for the lowest frequency band at maximum power (from Table 2. Propagation Study Sheet) to be used at this proposed site are required. Propagation studies must include all backup data used to perform the analysis at each height. Maps must be submitted in 10-foot increments below the proposed height of 85 feet (75 feet, 65 feet, etc.). At each level, a narrative must be submitted describing the area that is no longer covered that is primarily and essentially within the city. Continue to show 10-foot increments until there is a significant change

in coverage.

We have reviewed the propagation maps shown at 80 feet and 70 feet, and the accompanying narrative describing the purported loss in coverage. The narrative states "A significant loss in coverage can be seen to the southeast of the proposed site (W047). There is also a loss in coverage to the southwest of the proposed site." We do not see significant losses in the provided propagation maps. We need additional narrative detailing the purported loss in coverage. We recommend a brief conference call with the individual(s) that we be providing the additional information to make your next submittal complete. This item is INCOMPLETE.

Response: Per the conference call held between CMS, GPD Group, and AT&T on December 11, 2023, there is a ridgeline to the southeast of the site that is approximately 50' higher in ground elevation than the proposed tower site. The ridge is topped with mature trees that are 50' or greater in height. Based on this information, CMS agreed that 80 feet is an acceptable minimum required height for the proposed antennas.

GPD Group feels that each item has been addressed to meet the requirements of the zoning ordinance. If you or CMS require any additional information or have any questions, I can be reached via email at mbeddow@gpdgroup.com or my direct office line at 234.231.7960.

Sincerely,

GPD Group



Michael Beddow, PE
Associate Project Manager