Thinking outside the sphere

# Initial Review of Application for DRI: New Tower at 524 Great Road North, Mashpee, MA

January 22, 2026

Cellco Partnership d/b/a Verizon Wireless (Applicant) proposes a 130-ft monopole tower at 524 Great Road North, Mashpee which was referred on November 5, 2025 for Development of Regional Impact (DRI) approval by the Cape Cod Commission (Commission). It would be a new structure.

## Summary:

The application materials are complete and describe a proposed facility that has a design familiar to the Commission. From a wireless communications perspective, the proposed design raises no red flags on topics such as radio energy safety, facility size and capacity.

The application includes information provided by C-Squared Systems on behalf of Verizon Wireless depicting predicted existing and proposed coverage at 700 MHz and 2100 MHz, as well as measured coverage data (drive data) in the area of the proposed monopole, in order to demonstrate the need for the site (for Verizon Wireless).

## Application Requirements:

The DRI Review requirements state, by section (summarized):

- **Demonstration of a coverage and/or capacity problem requiring a solution**

As mentioned in the summary, above, the application includes information as Tab 6 from C-Squared Systems on behalf of Verizon Wireless to demonstrate the need for the proposed facility. There are several prediction plots (Attachment A and B) and 2 plots of drive data, (Attachments F and G) collected December 16, 2021.

Turning to a broader analysis, the Subcommittee can interpret the plots in this way:

- White areas on Attachment A indicate areas where Verizon is predicted to have sub-standard coverage on both bands (700 and 2100) that are being presented here,
- Green areas are areas where Verizon is predicted to have acceptable coverage at 700 MHz but not at 2100 MHz.

- Yellow areas are where Verizon is predicted to have acceptable coverage at both 700 MHz and 2100 MHz.

This portion of the submission raises several questions:

1. Is drive data collected in 2021 the most recent and accurate drive data available?
2. The RF report was done in May, 2023. Do the report, the drive data and the prediction plots reflect current operating conditions (sites on air, operating parameters and bands, etc.)?
3. Verizon is building and attaching to a number of small cells on Cape Cod, yet this report contains no indication that any small cells exist in the area shown on the plots. Does this remain the case? Are any proposed or approved for the future that would be in the area of the plots?
4. Based on both the drive data and predictions provided, the area of the proposed site appears to be well covered by Verizon at 700 MHz. There are areas of predicted and measured substandard coverage at 2100 MHz. We do not see any data or claims to support a "network capacity" concern or argument supporting this site. Therefore, can we conclude the applicant's justification/demonstration of need for this site is as a 2100 MHz coverage enhancement only?

- **Demonstration that all existing structures have been identified and fairly rejected**

We have reviewed the "Alternative Site Analysis" under tab "D" of the application narrative. We find the "search ring" shown on the bottom of page 26 to be confusing. Taken at face value, the outlined area on the map appears quite large. In fact, the search area as defined on the map includes one existing wireless site that Verizon has located upon (NW corner of the map, near Otis) and is adjacent to another site (250 Currier Road, near the Fairgrounds). The search ring also includes Ashtaumet, Moody and Johns Ponds. We do not believe any of these locations would have been reasonable locations for siting a new tower, either because they are a pond, or because they are quite close to locations where Verizon has already placed a site and has coverage.

That analysis aside, we have researched all the available records and it does not appear that there are any existing structures of height near the proposed location, either existing wireless facilities or tall structures without wireless.

- **Demonstration that proposed location and height will solve (the) problem**

**And**

- **Demonstration that proposed height is minimum necessary to achieve coverage of target area.**

We do not see any plots of lower height to demonstrate that the proposed height is the minimum necessary to meet the applicant's needs. Please provide them.

- **Demonstration of visual impact of proposed new structure.**

Included and noted. There has been a balloon flight (July 13, 2023) and 2 photosimulations done based on that balloon flight. The location does appear to be well chosen for minimum visual impact of the ground level compound, nearby the site, with significant tree screening around the site location. There may be seasonal views of the ground equipment from Old Barnstable Road but it is unlikely that the ground equipment will be visible from any other public way or structure other than the Verizon building on site. However, the height of the proposed tower does result in some visibility of the tower over the trees on nearby roads, particularly on Great Neck Road.

- **Demonstration of Camouflaged Siting and Design Features**

Included. As above, the ground equipment does appear to be screened from public view to the extent possible (by site selection) by the surrounding vegetation (which will not be removed, according to the plans) and the setback from the roads.

- **Demonstration of Co-Location Capability**

The applicant (Verizon) has indicated that the tower is designed for colocation but no number of potential colocators is listed. How many carriers additional to Verizon will the proposed tower be designed to support?

- **Radiofrequency Radiation (RFR) Filing Requirements**

The radio frequency energy safety analysis confirms the facility would be compliant with the FCC requirements, which is the extent to which the placement of the facility on this basis can be controlled. The analysis only includes Verizon and therefore, any future carrier tenants will need to provide (to the town of Mashpee, in their permit application) their own safety analysis, including any existing carriers (Verizon initially) and their proposed operation in aggregate. The carriers' final designs of their facilities, in combination with the other carriers on site, are required to be always compliant under the terms of their FCC licenses.

- **Hazardous Materials Filing Requirements**

Attorney Giaimo's statement on Hazardous Materials is "*As is typical for its other cell sites in this area, the facility will use batteries, installed within a cabinet, for power back-up. The exact type and number will be determined before the Applicant applies for a building permit.*"

- **Noise Filing Requirements**

In the application, we do not find any reference to a Generator proposed on site. If the applicant is not proposing a generator now or in the future, then noise from the facility should be inconsequential and the applicant has also commissioned a noise study (Tab 11) which reaches the same conclusion.

# Conclusion:

The applicant has addressed most sections of the DRI review requirements, as listed above.

This concludes our initial review of the application.

Michael Lawton