Thinking outside the sphere

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

February 26, 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).

C-Squared has provided additional materials and information on February 18, 2026 via counsel, in addition to several other items from other sources. This follow-up/second report will focus on the questions asked of the applicant in the first report and during the hearing on February 2, 2026 and their written responses.

## Applicant responses to questions:

We have summarized and analyzed the responses received, in line with the questions below, with Isotrope content underlined and highlighted in yellow:

1. Is drive data collected in 2021 the most recent and accurate drive data available? Isotrope: The applicant, through C-Squared, has confirmed that the latest drive test data collected is from 2021, no more recent drive test has been completed in this area. C-Squared has also stated that there have been no “substantive changes to the Verizon’s network in the area that would materially impact the 2021 drive data”. As such, we accept the data as being as current as possible and meaningful for conclusive analysis.
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.)? Isotrope: The applicant, through C-Squared, has confirmed that “No new sites or configuration changes have been identified that would materially impact the propagation

plots…presented in the RF Report" As such, we accept the plots and analysis as being as current as possible and meaningful for conclusive analysis.

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? Isotrope: The applicant, through C-Squared, has confirmed that "Verizon does not operate any small cells in the area around the proposed site in the view of the RF Report maps, nor are any currently proposed or approved" As such, we accept the plots and analysis as presented.
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? Isotrope: The applicant, through C-Squared, has added information as requested, to demonstrate that in addition to a 2100 MHz "coverage gap" as shown on their plots, they claim a congestion issue or capacity limitation on the "Alpha sector" of the site labelled "Mashpee S" and located at 154 Industrial Drive, Mashpee. This sector appears to be oriented North or close to North, and currently covers the Mashpee rotary, as well as much of the area on Great Neck Road, and to the west of Great Neck Road, that the proposed site will cover, according to Attachment C of C-Squared's initial RF Report, submitted with the application. The graph on page 2 of the RF report of the Feb 18 submission demonstrates that the 700 MHz layer on this sector is heavily utilized, and could suffer service-affecting congestion during the busy hour. If coverage on other bands were sufficient in this area, this congestion could be handled by other bands but in this situation, those other bands would not provide adequate coverage. Based on the data presented, Isotrope does agree with the conclusion that congestion and traffic load on the 700 MHz layer of the Alpha sector of "Mashpee S" is a valid concern for Verizon and can be considered as an additional "driver" for Verizon's asserted "need" for this proposed site – along with the predicted 2100 MHz coverage limitations.
5. 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. Isotrope: The applicant, through C-Squared, has provided the requested analysis as attachments "H"(106') and "I" (86') in their February 18 submission. These plots should be compared to Attachments "A" and "B" to the initial RF report and filing. The applicant has not complied with the written requirement of the DRI (10' increments), however in this case, the plot differences shown with 20' increments are so minor that reviewing 10' increments would likely not lead to a different conclusion.
   As always, the Commission must trade off the coverage available to the applicant/carrier, the needs/"gap" demonstrated and the visual impact of the heights at various scenarios to

determine that the minimum height and visual impact is approved. The applicant has also provided 150' photosimulations so the visual impact can be very well reviewed. When reviewing the "new" photosimulations with 4 platforms shown on the tower, the Commission can cross-reference the photos by "removing" the top 2 platforms to visualize what the tower would look like at 110' (106' Verizon radiation center) with coverage on Attachment "H", and "removing" all 4 platforms to visualize the tower at 90' (86' Verizon radiation center) as shown in Attachment "I". One item of concern that has been raised in past hearings is the available height for the lowest co-locator on the tower. With 3 carriers operating networks on Cape Cod, the available height for the lowest carrier would be 20' below Verizon, and therefore 66' for an overall tower height of 90'. We do not have any data on the tree height but Isotrope believes that the nearby trees are possibly taller than 66' which would make this tower much less appealing to the lowest potential colocator if it is within the tree canopy.

6. How many carriers additional to Verizon will the proposed tower be designed to support? Isotrope: We do not see a written response to this question. There was a verbal comment in the Commission meeting in Mashpee by an unknown member of the applicant's team that the tower "would be" designed to support the 3 total carriers (Verizon, AT&T and T-Mobile) currently operating networks on the Cape, but the Commission may wish to have this statement supported with written documentation or shown on the project plans, as has been done in prior DRI applications, particularly if the coverage to be realized by potential co-locators, lower on the tower, is a factor in the Commission's decision.

## Conclusion:

One question remains open, Question #6, above, from our review. We look forward to discussing the trade-off listed in item #5 above with the Commission and staff during the hearing on March 2.

Michael Lawton