



Crown Castle
3020 Katy Freeway
Houston, TX 77024



9/9/2022

Kathleen A. Gargano
Village Manager
Village of Hinsdale
19 E. Chicago Ave.
Hinsdale, IL 60521

**Re: Crown Castle Application
Small Wireless Facility on New Utility Pole at Intersection of Woodland Ave. & Taft Road**

Dear Ms. Gargano:

We write in response to the July 19, 2022, Village of Hinsdale (the “Village”) letter claiming the June 17, 2022, application by Crown Castle Fiber, LLC (“Crown Castle”) for a Small Wireless Facility on a New Wood Utility Pole at the Intersection of Woodland Ave. and Taft Road (the “application”) is deficient.

Crown Castle disputes the legality of the specific requirements indicated by the Village in its July 19, 2022, letter. They violate Illinois’s Small Wireless Facilities Deployment Act (50 ILCS 840/15, *et seq.*) (the “Act”), are preempted by federal law (*see FCC Declaratory Ruling and Third Report and Order – In the Matter of Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*) (the “FCC Order”), or both. Nonetheless, in the spirit of good faith and cooperation, Crown Castle provides amended application materials with this letter. Crown Castle, however, reserves all rights to challenge the legality of any and all provisions required by the Village’s small cell application process and design requirements. This supplement should not be considered a waiver of any future claims or arguments.

Crown Castle trusts that the amended materials address the Village’s concerns with regard to the specific requirements to which they are addressed. Crown Castle categorically denies the validity of the remaining requirements identified in the Village’s July 19, 2022, letter, as a violation of the Act, preempted by the FCC Order, or both.

The Act mandates that a municipality “not prohibit, regulate, or charge for the collocation of small wireless facilities” except as provided within the Act. 50 ILCS 840/15(b). The Village’s application requirements indicated within its local code far exceed the bounds defined within the State Act. Hinsdale Loc. Code. Chp. 8 § 13, *et seq.* The Act further provides that application and design requirements must be applied on a non-discriminatory basis. 50 ILCS 840/15(d)(6). As such, Crown Castle is within its rights to object to the legality all of the Village’s application requirements as they are either (1) not expressly permitted under the Act, (2) being applied to small cell wireless providers on a discriminatory basis, or (3) both.

The FCC Order provides that state or local regulations that “prohibit or have the effect of prohibiting [the collocation of small wireless facilities] are unlawful and thus preempted” under 47 U.S.C. §§ 253(a) and 332(c)(7)(B). FCC Order at ¶ 34. An “effective prohibition” exists if an application requirement “materially limits or inhibits the ability of any competitor or potential competitor to compete in a fair and balanced legal and regulatory environment.” *Id.* at ¶ 35; *In the Matter of Ca. Payphone Ass’n*, 12 F.C.C.R. 14191, 14206 (1997). The FCC Order further provides that aesthetic requirements are preempted unless they are “(1) reasonable, (2) no more burdensome than those applied to other types of infrastructure deployments, and (3) objective and published in advance.” FCC Order at ¶ 86. As such, the Village’s aesthetic requirements are preempted by federal law in that they are (1) a material limitation on Crown Castle’s ability to compete in the market, (2) unreasonable, (3) applied in a discriminatory fashion, and/or (4) not objective nor published in advance.

Crown Castle responds to each of the Village’s objections using the Village’s numerical system provided on its July 19 letter for ease of reference. The headings and sub-heading descriptors below are used solely for convenience.

We look forward to amicably resolving this dispute.

(I) Application and Documentation Requirements

(1) Requirement that the equipment has the smallest visual profile.

The Village argues that the application does not indicate whether Crown Castle’s equipment has the smallest visual profile technologically compatible with the local network system. The Village’s attempt to dictate which technology Crown Castle uses is preempted by the FCC Order. *See New York SMSA L.P. v. Town of Clarkstown*, 612 F.3d 97 (2nd Cir. 2010).

Nonetheless, Crown Castle hereby certifies that the antenna and other equipment it intends to use has the smallest commercially available visual profile that is compatible with the local network system. Crown Castle reserves all rights.

(2) Certification of compliance with Village design standards and “various other requirements set forth in this chapter and Code.”

The Village argues that Crown Castle’s certification is deficient as it does not include certification related to Chapter 7-IG of the Village’s local code (Construction of Utility Facilities in Right of Way). In

addition, the Village also objects to the language contained within the certification “to the extent they do not conflict with State or federal law.”

Crown Castle notes from the outset that this requirement is vague with respect to the Village’s reference to “various other requirements set forth in this chapter and Code.” Section 13-8-5(A.7) of the local code does not provide additional detail concerning the “various other requirements” and, thus, the requirement is impermissibly vague as a whole and is not permitted by the Act. Moreover, as the Village has not specifically identified Crown Castle’s alleged deficiencies concerning this requirement the requirement is “deemed complete.” 50 ILCS 840/15(d)(7). Lastly, given the vague nature of this requirement, it is an unreasonable material limitation on construction and is therefore preempted by federal law.

Nonetheless, Crown Castle provides an amended certification which notes compliance with Chapter 7-IG. *See* Ex. A attached hereto. For the reasons outlined in this letter, however, Crown Castle will not remove the language regarding the Village’s requirements that conflict with state or federal law. Crown Castle reserves all rights.

(3) Requirement that drawings must include illustration of route the power lines will be extended to serve the site.

The Village argues the application requires an updated illustration of the route of the power lines for three purported reasons (1) the possible existence of a sanitary sewer beneath the right of way, (2) Crown Castle has not been granted a right of way permit, and (3) the application does not indicate whether boring or aerial installation will be used or whether any driveways will be affected by the construction.

From the outset, Crown Castle notes the Village’s local code does not expressly include the specific requirements related to construction. Therefore, Crown Castle is under no obligation to comply with the Village’s demand on this point. Nonetheless, Crown Castle addresses each of the Village’s concerns below.

First, the sanitary sewer does not appear to be near the proposed pole location. Moreover, as a practical matter, Crown Castle will not be able to confirm the exact location of the sanitary sewer until it consults with JULIE. As you know, such a consultation cannot occur until after the Village has approved the application and construction is ready to proceed. Of course, if the Village has confirmed the exact location of the sewer, we welcome any and all documentation regarding it.

In any event, the fiber conduit will likely pass perpendicularly to the sewer line, as is frequently necessary. Sanitary sewers are typically buried 8-10 feet underground, while the fibers will be buried only one foot deep. Thus, a conflict between the fiber and the sewer is highly unlikely. And, to protect against the unlikely event of a conflict, Crown Castle requires its contractors to hand dig in any area where JULIE indicates the existence of underground utilities. This is similar to how other utilities handle underground installations. Crown Castle is committed to working with the Village to ensure the integrity of the sewer is not affected once it has approved the application.

Second, Crown Castle, as a practical matter, cannot obtain a right of way permit before the Village approves its application. If Crown Castle obtains a right of way permit before final application approval, the permit will likely expire before Crown Castle begins construction. This is why other utilities working in the right of way seek and obtain construction application approvals *before* applying for a right of way permit. Thus, Village's requirement is discriminatory, unreasonable, and a material limitation to construction for all of reasons stated above. The requirement is therefore invalid under the Act and preempted by the FCC Order. Crown Castle will provide the Village proof of the grant of a right of way permit after application approval and prior to construction. Crown Castle, of course, has no objection to the application approval being contingent upon Crown Castle obtaining a right of way permit before beginning construction.

Third, Crown Castle will use boring for this pole. In addition, Crown Castle confirms that construction will not disturb any driveways.

Crown Castle reserves all rights.

(4) FAA 1-A Certification.

The Village argues that a FAA 1-A certification is required for its application, even though it is not expressly required within its local code. In addition, this requirement is not expressly permitted by the Act and is therefore unlawful. Further, the Village has not specifically identified Crown Castle's alleged deficiencies concerning this requirement and, therefore, the requirement is "deemed complete." 50 ILCS 840/15(d)(7). Lastly, this requirement is preempted as it is an unreasonable material limitation on construction considering the onerous nature of obtaining an FAA 1-A Certification.

Nonetheless, Crown Castle provides the FAA 1-A Certification, it is attached hereto as Ex. B. Crown Castle reserves all rights.

(5) Statement regarding the frequencies of the facility.

The Village argues that Crown Castle is required to provide a statement that the frequencies of the facility will not interfere with those used by public safety departments.

Crown Castle provides the requested statement. It is attached hereto as Ex. C. Crown Castle reserves all rights.

(6) Copies of all licenses, permits, and approvals required by Village and all units of government with respect to design, construction, location and operation of the small wireless facility.

The Village argues that the application is required to provide all “licenses, permits, and approvals” by all “units of government with jurisdiction over the design, construction, location and operation” of the facility. This requirement is extremely vague and duplicative of requirement (I)(1) above (note that Crown Castle has provided a certification of compliance). This requirement is not permissible under the Act and is being applied in a discriminatory fashion. In addition, the requirement is preempted considering the lack of specificity amounts to a material limitation on construction. Crown Castle reserves all rights.

(7) Evidence of consent of the owner, to the extent the facility will be affixed to an existing pole.

This requirement is not applicable to the instant application because it is for a new pole. Crown Castle reserves all rights.

(8) Pre-application review with Village staff.

As noted by the Village, this is not required by the local code, therefore, Crown Castle is not obligated to comply. Moreover, if this were a requirement, it is not permitted by the Act and is a material limitation on construction. It is therefore invalid under state law and preempted by federal law. Crown Castle reserves all rights.

(9) Detailed information on compliance with FCC related to radio frequencies.

The Village argues that Crown Castle is required to provide “information on compliance” with certain FCC standards including “compliance with radio frequency emissions, technical data reasonably necessary to evaluate compliance with maximum permissible exposure levels . . . and a monitoring plan relative to radio frequency emissions.” The Village asserts that this requirement implicates public safety, but provides no support for the same. As such, this requirement is invalid under the Act and is likely

applied in a discriminatory fashion. In addition, this requirement is preempted as it is an onerous and an infeasible material limitation.

Nonetheless, Crown Castle will provide a Maximum Permissible Exposure (“MPE”) Study, which supplies the requested information on compliance with radio frequency emissions and provides technical data to evaluate compliance with maximum permissible exposure levels. It is attached hereto as Ex. D. Crown Castle reserves all rights.

(10) Proof of licenses required by FCC pursuant to the National Environmental Policy Act (“NEPA”).

The Village argues that Crown Castle is required to provide an environmental assessment and review under NEPA. The Village asserts that this requirement implicates public safety, but provides no support for the same. As such, this requirement is invalid under the Act and is likely applied in a discriminatory fashion. In addition, this requirement is preempted as it is onerous and an infeasible material limitation. Crown Castle will obtain this proof of license as a matter of course as it progresses to construction. This is how such projects normally proceed. Crown Castle will provide the Village with a copy at that time. Crown Castle, of course, has no objection to the application approval being contingent upon Crown Castle providing such proof. Crown Castle reserves all rights.

(11) Written report that analyzes acoustic levels for the facility to show compliance with Village noise regulations.

The Village argues that Crown Castle is required to proactively provide a report analyzing the anticipated acoustic levels of the facility that is not yet installed. This requirement is not expressly included within the Act and is therefore invalid. In addition, this requirement is preempted as it is practically infeasible, as it is impossible to analyze the acoustic levels of the facility prior to construction.. Crown Castle reserves all rights.

(12) Written description and/or map identifying the geographic service area for the facility.

The Village argues that Crown Castle is required to provide a written description and/or map identifying the geographic service area for the facility. This requirement is invalid as is not expressly permitted under the Act. In addition, this requirement is preempted under federal law as it is an onerous requirement that amounts to a material limitation on construction. Crown Castle reserves all rights.

(13) Information indicating whether the facility is claimed to be located in an easement for compatible use.

The Village argues that Crown Castle is required to indicate whether the facility is located in an easement for compatible use. This requirement is not permitted under the Act and is thus invalid. In addition, this requirement is preempted under federal law as it amounts to a material limitation on construction. Crown Castle reserves all rights.

(14) Master plan identifying the location of the facility in relation to all existing and potential locations within the Village that are reasonably anticipated for construction within two years of submittal of the application.

The Village argues that Crown Castle is required to provide a “master plan which identifies the location of the proposed small wireless facility in relation to all existing and potential locations in the Village that are reasonably anticipated for construction within two (2) years of submittal of the application.” This requirement is invalid under the Act as it is being applied in a discriminatory fashion and is not expressly permitted. In addition, this requirement is preempted by federal law considering it amounts to a material limitation and is completely unreasonable to the Village to expect a provider to provide each and every location “reasonably anticipated” for construction within two years.

Nonetheless, Crown Castle will provide an existing map of the nodes it plans in the current project. See Ex. E attached hereto. Crown Castle reserves all rights.

(15) The name of the wireless provider.

The Village argues that Crown Castle is required to provide the name of its wireless service provider customer. This requirement is invalid considering it is not expressly permitted by the Act. Nonetheless, Crown Castle states that the provider is Verizon Wireless. Crown Castle reserves all rights.

(16) Proposed notice of mailing to occupants of nearby properties.

The Village argues that Crown Castle is required to provide notice of mailing to occupants of “nearby properties” within three days of submission of an application. This requirement is invalid as it is not expressly permitted by the Act and is being applied in a discriminatory fashion. In addition, the requirement is preempted by federal law, as it is discriminatory and an unreasonable material limitation.

Nonetheless, Crown Castle will send notice to all residences within 200 feet of the subject node within 60 days of construction. A proposed notice is attached hereto as Ex. F. Crown Castle reserves all rights.

(17) Documentation regarding compliance with all ordinances of general application pertaining to installations in the right of way and right of way usage related to the National Electric Code.

The Village argues that Crown Castle is required to provide certification that its construction will be in compliance with “all ordinances of general application pertaining to the installations of the right of way, right of way usage, and the National Electric Code.

Crown Castle notes this requirement is vague with respect to the Village’s reference to “all ordinances of general application pertaining to the installations of the right of way [and] right of way usage” and, thus, is not permitted by the Act. Moreover, the Village has not specifically identified Crown Castle’s alleged deficiencies concerning these items (other than compliance with the National Electric Code) and, therefore, this portion of the requirement is “deemed complete.” 50 ILCS 840/15(d)(7).

Nonetheless, Crown Castle will comply with the National Electric Code. Please see the certification regarding the same attached hereto as Ex. G. Crown Castle reserves all rights.

(18) Statement of Compliance with local, federal, and state regulations and safety standards.

The Village argues that Crown Castle is required to provide a “statement of compliance with local, federal, and safety regulations standards. . . .” This requirement is invalid from the outset, as it is not included within the Village’s local code. In addition, the requirement appears to be duplicative of the statement of compliance referenced in (I)(1) above. The Village cites Section 15(d)(6) of the Act in support of its position, but Section 15(d)(6) does not indicate that a certificate of compliance with all safety standards at all government levels may be required.

Crown Castle further notes this requirement is vague with respect to the Village’s reference to “local, federal, and safety regulations standards” without specifying them and, thus, is not permitted by the Act. Moreover, the Village has not specifically identified Crown Castle’s alleged deficiencies concerning these items and, therefore, this portion of the requirement is “deemed complete.” 50 ILCS 840/15(d)(7). This requirement is invalid under the Act. Crown Castle reserves all rights.

(19) Information regarding the contractor for the project.

The Village argues that Crown Castle must provide information regarding all contractors that will work on the project. As is standard, once the construction is approved, the project will be put out for contractor bid. Crown Castle will provide all contractor information to the Village at that time. To the extent the Village is requiring Crown Castle to identify its contractors before it has put the project out for contractor bid, the requirement is applied in a discriminatory fashion and is unreasonable. Crown Castle, of course, has no objection to the application approval being contingent upon Crown Castle identifying its contractors before beginning construction. Crown Castle reserves all rights.

(20) Entity providing backhaul network.

The Village argues that Crown Castle must provide information regarding the entity providing the backhaul network for the facility. This requirement is invalid as it is not expressly permitted under the Act.

Nonetheless, Crown Castle states that it is providing connectivity to the site through its own fiber-optic network. Crown Castle reserves all rights.

(21) Completion of FCC OET forms.

The Village argues that Crown Castle is required to complete the FCC Office of Engineering and Technology (OET) forms. This requirement is not explicitly provided within the Village's local code. In addition, this requirement is not expressly permitted by the Act. The requirement is, therefore, invalid. Crown Castle reserves all rights.

(22) Affirmation of compliance with local building codes.

The Village argues that Crown Castle is required to "affirm" that it will comply with the "various building codes adopted by the Village." This requirement is invalid from the outset, as it is not included within the Village's local code. In addition, the requirement appears to be duplicative of the statement of compliance referenced in (I)(1) above. Moreover, a requirement that a provider must provide a statement "affirming" compliance with municipality building codes is not permitted by the Act. Therefore, this requirement is invalid. Further, the Village has not specifically identified Crown Castle's alleged deficiencies concerning this requirement and, therefore, the requirement is "deemed complete" under the Act. 50 ILCS 840/15(d)(7). Crown Castle reserves all rights.

(II) Design Requirements

(1) Requirement regarding designation of temporary or permanent pole and Village's prohibition of new non-replacement wooden poles.

The Village argues that Crown Castle is required to indicate whether the pole will be temporary or permanent and notes that it has prohibited non-replacement wooden poles. These requirements are invalid as they are not expressly permitted by the Act and are being applied in a discriminatory fashion. In addition, this requirement is preempted by federal law as the outright prohibition of new non-replacement wooden poles is unreasonable. Crown Castle reserves all rights.

(2) Village's prohibition of facility within 200 feet of a residence.

The Village argues that Crown Castle's proposed location is invalid because it is purportedly within 200 feet of a residence. The Village, however, has not proposed an alternative location for the facility, as is required by Section 15(d)(3) of the Act. Since this portion of Crown Castle's application was not adequately rebutted, it is "deemed complete" under the Act pursuant to Section 15(d)(7). Crown Castle reserves all rights.

(3) Requirement for top-mounted antennas and "smooth transition" between utility pole, antenna, and enclosure.

The Village argues that the antennas must be top-mounted to the proposed new pole. This requirement is invalid as it is not technically feasible to mount the antennas for a small wireless facility with a top-mounted antenna. This requirement is preempted by federal law as it is unreasonable and amounts to a material limitation on construction. Crown Castle reserves all rights.

(4) Requirement that metal flaps be "flush mounted" to pole.

The Village argues that the facility's metal flaps must be "flush mounted" to the pole. This requirement is invalid as it is not technically feasible to flush mount the facility to the pole. The antenna must be affixed to the pole on a hinge to permit the wireless provider position the antenna at the correct angle to focus coverage within a specific area. The gap between the node and the pole is necessary to create room for the hinge and the antenna has the ability to move. Metal flaps being flush mounted to the pole prevents the possibility of the antenna being adjusted. As such, this requirement is preempted as it acts as an effective prohibition on small wireless facilities and is, therefore, unreasonable and a material limitation. Crown Castle reserves all rights.

(5) Prohibition on antennas facing oncoming flow of traffic.

The Village argues that the facility's antennas may not face oncoming traffic. This requirement is not technically feasible due to the azimuths of the antennas. As such, this requirement is preempted as it is unreasonable and a material limitation on construction. Crown Castle reserves all rights.

(6) Placement of 4" x 6" plate with wireless provider's name.

The Village argues that Crown Castle is required to place a plate with the wireless provider's name location and an emergency telephone number. This requirement is invalid from the outset as it is not explicitly required by the local code. In addition, the requirement is not expressly permitted by the Act and is, therefore, invalid. Nonetheless, Crown Castle will install the requested plate providing its own name and contact information. Crown Castle reserves all rights.

(7) Village's assertion that proposed pole does not "minimize the visual or aesthetic impact of the new vertical element."

The Village argues without specificity that the pole does not "minimize the visual or aesthetic impact of the new vertical element and its associated small wireless facilities upon the surrounding area and does not blend in with the surrounding streetscape." This requirement is vague and appears arbitrary. The requirement is preempted as it is a material limitation and unreasonable. Further, the Village has not specifically identified Crown Castle's alleged deficiencies concerning these items and, therefore, this portion of the requirement is "deemed complete." 50 ILCS 840/15(d)(7). Crown Castle reserves all rights.

(8) Village's assertion that the new pole does not "have a smooth pole shaft, and is not tapered in diameter from the base to the top."

The Village argues that the pole does not have a "smooth pole shaft, and is not tapered in diameter from the base to top." As a general matter, wooden poles are not typically tapered as evidenced by existing ComEd poles. Indeed, Crown Castle sources its poles from some of the same suppliers as ComEd. The requirement is invalid under the Act as it is being applied in a discriminatory fashion. In addition, this requirement is preempted as it is a material limitation and is completely unreasonable. Crown Castle reserves all rights.

(9) Indication how the pole will be supported.

The Village argues that Crown Castle is required to support its wooden pole with a concrete foundation. This requirement is not technically feasible for a wooden pole. Only metal poles are reinforced with a concrete foundation. A review of other utilities' wooden poles in the Village bears this out. Wooden

poles are buried according to a specific formula, which is two feet plus 10% of the overall height of the pole. For these reasons, the requirement amounts to a material limitation and is unreasonable under federal law. The requirement is, therefore, preempted. In addition, the requirement is invalid under the Act as it is being applied in a discriminatory fashion, considering ComEd uses the same formula for burying wooden poles and is not subject to the requirement to use a concrete foundation. Crown Castle reserves all rights.

(10) Concealment measures beyond painting equipment to match the pole.

The Village argues that Crown Castle is required to propose additional concealment measures beyond painting the equipment to match the pole. This requirement is invalid under the Act as it is vague and is applied in a discriminatory fashion. Moreover, the Village has not specifically identified Crown Castle's alleged deficiencies concerning this requirement and, therefore, the requirement is "deemed complete" under the Act. 50 ILCS 840/15(d)(7). In addition, the requirement is preempted considering requiring the provider to experiment and come up with additional concealment measures outside those required by local code is unreasonable and amounts to a material limitation on construction. Crown Castle reserves all rights.

(11) Illustration of Quazite box and handhole for underground fiber conduit and interface.

The Village argues that Crown Castle is required to propose or illustrate a Quazite box and handhole for an underground fiber conduit and interface. However, the box and handhole for the underground fiber conduit are one and the same as the box and handhole for the power conduit and connection. Thus, Crown Castle has already shown these items to the Village. Crown Castle reserves all rights.

(12) Village prohibition of trenching within drip line of existing trees.

The Village argues that the proposed location is within the drip line of existing trees. The Village, however, does not provide any guidance or additional materials on how Crown Castle is to verify the drip line. The Village has not specifically identified Crown Castle's alleged deficiencies concerning this requirement and, therefore, the requirement is "deemed complete" under the Act. 50 ILCS 840/15(d)(7). Moreover, the requirement is preempted considering requiring providers to conduct a study regarding the drip line of trees prior to application submittal amounts to a material limitation and is unreasonable. Crown Castle reserves all rights.

(13) Structural evaluation in event Crown Castle intends to construct a new metal pole.

This requirement is not applicable to Crown Castle's application, as it intends to construct a wooden pole. Crown Castle reserves all rights.

(14) Regarding Crown Castle's arguments that design standards are preempted by State Act.

Please see Crown Castle's responses throughout this letter.

(15) Requirements that:

- **Various equipment has UL listing that provides for painting without voiding listing.**

Crown Castle hereby confirms that its equipment has UL listing that provides for painting without voiding listing. Crown Castle reserves all rights.

- **Pole is outside the critical root zone of nearest 6" tree.**

The Village argues that Crown Castle is required to confirm that the pole is outside of the critical root zone of the nearest 6" tree. The Village, however, does not provide any guidance or additional materials on how Crown Castle is to verify the critical root zone. Crown Castle notes that other municipalities have published critical root zone standards, but Hinsdale has not. To the extent the Village were to adopt the same standards as Washington D.C., Crown Castle intends to comply with the same. Moreover, the requirement is preempted as requiring providers to conduct a study regarding the critical root zone prior to application submittal amounts to a material limitation and is unreasonable. Crown Castle reserves all rights.

- **Pole is at least 12' from nearest driveway on south side of Taft.**

The Village argues that Crown Castle is required to confirm that the pole will be at least 12' from the nearest driveway on the south side of Taft. This requirement is invalid, considering it is not expressly permitted by the Act. In addition, this requirement is preempted as it is unreasonable and amounts to a material limitation on construction. Nonetheless, Crown Castle hereby confirms that the proposed pole is at least 12' from the nearest driveway on the south side of Taft. Crown Castle reserves all rights.

(III) Other

(1) Existing ComEd pole within 200 feet of proposed new pole.

The Village argues that Crown Castle is required to implement its facility on an existing ComEd pole within 200 feet of the proposed location. From the outset, Crown Castle notes that the Village states that a ComEd pole within 200 feet of the proposed location exists, but does not propose a specific new location. Since this portion of Crown Castle's application was not adequately rebutted, it is "deemed complete" under the Act pursuant to Section 15(d)(7). Further, under Section 15(d)(3) of the Act, the

provider is only required to construct on the new location if it can be done on “reasonable terms and conditions and the alternate location and structure does not impose technical limits or additional material costs as determined by the applicant.” As noted on Crown Castle’s initial application, the installation may be prohibited by ComEd’s design standards. Considering the Village has not complied with the Act, this requirement is invalid. Crown Castle reserves all rights.

(2) Conflict with sanitary sewer.

Please see Crown Castle’s response in Section (I)(3) above. Crown Castle reserves all rights.

(3) Requirement to include Village right of way permit application.

Please see Crown Castle’s response in Section (I)(3) above. Crown Castle reserves all rights.

(4) Liability insurance limits requirements.

Please see an updated Certificate of Insurance attached hereto as Ex. H. Crown Castle reserves all rights.

(5) Liability insurance additional insureds requirements.

Please see an updated Certificate of Insurance attached hereto as Ex. H. Crown Castle reserves all rights.

Invoice for Third-Party Review

Finally, we are in receipt of an invoice from the Village seeking reimbursement of \$1,200 for a “third party plan review fee.” The Act, however, does not allow for such a fee. Specifically, it provides “[e]xcept as provided in this Section, an authority may not prohibit, regulate, or charge for the collocation of small wireless facilities.” 50 ILCS 840/15(b). That section allows for fees of up to \$650 on an existing pole and \$1,000 on a new pole. *Id.* 15(e). The Village charged Crown Castle a \$1,000 fee for the current application, which Crown Castle has already paid.

Processing Deadlines

Crown Castle has submitted the information requested by the Village that is not barred by the Act, preempted by the FCC Order, or both. Thus, the processing deadlines for the Application are no longer

tolled. The Village has until December 10, 2022, to approve or deny this Application or it shall be deemed approved under 50 ILCS 840/15(d)(8)(B).

Sincerely,

Maureen Whitfield

Director, Network Permitting & Utilities

T: (630) 480-5227

westernsuburbs@crowncastle.com

Ex. A, Certification of Compliance with Design Standards

Ex. B, FAA 1-A Certification

Ex. C, Statement Regarding Frequencies of the Facility

Ex. D, MPE Study

Ex. E, Map of Planned Nodes in Project

Ex. F, Proposed Notice of Mailing

Ex. G, Certification of Compliance with National Electric Code

Ex. H, Certificate of Insurance

Exhibit A, Certification of Compliance with Design Standards



Crown Castle
8020 Katy Freeway
Houston, TX 77024

Certification of Compliance with Design Standards

Crown Castle certifies that, to the best of Crown Castle's knowledge, the collocation referenced herein complies with the written design standards established by the Village, and with Chapter 7-IG of the Village's code, to the extent that they do not conflict with State or federal law.

Exhibit B, FAA 1-A Certification



5101 Thatcher Road, Downers Grove, IL 60515

P: (630) 572-9999

FAA 1A Certification Letter

Date: May 11, 2022

Applicant: Crown Castle
3025 Highland Parkway
Suite 400
Downers Grove, IL 60515

Site Name: **CTRL_HINSDALEA_134**
Customer SCU: **507796**
PS Loc: **539494**
Site Location: Taft Road and Woodland Avenue
Hinsdale, IL 60521

Horizontal Datum Source: GPS, NAD 83 (North American Datum of 1983)
Vertical Datum Source: GPS, NAVD 88 (North American Vertical Datum of 1988)

Latitude: N 041° 47' 30.12" (Degrees, Minutes, Seconds)
N 41.79170 (Decimal)

Longitude: W 087° 54' 44.40" (Degrees, Minutes, Seconds)
W 87.91233 (Decimal)

Ground Elevation: 684.67 feet AMSL

Structure Type: Proposed Wood Pole

Top of Structure: ±718.67 feet AMSL
Center of Antenna (RCL): ±716.67 feet AMSL
Top of Antenna: ±717.27 feet AMSL

I certify that the latitude and longitude for the location of the structure is accurate to within ±20 feet horizontally and that the ground elevation is accurate to within ±3 feet vertically.

Owen L. Stamm
Illinois Professional Engineer
License No. 062-060931

Exhibit C, Statement Regarding Frequencies of the Facility

Statement of Compliance with paragraph (6) of Illinois Public Act 100-0585

On behalf of Crown Castle Fiber LLC ("Applicant"), I hereby certify that the frequencies of the Small Wireless Facility will not interfere with those used by public safety providers, including the Village of Hinsdale Police and Fire Departments, in accordance with Section 13-8-9 of the Village's Small Cell Ordinance:

The Applicant certifies that the collocations proposed in its application will operate within all applicable FCC standards to the best of the applicant's knowledge. The information provided by Applicant in this application is hereby certified as true and correct as of the date submitted.

The Applicant certifies that the collocation proposed in its application complies with FCC OET Bulletin 65.

On behalf of Crown Castle Fiber LLC:

A handwritten signature in black ink, appearing to read "Shawn P. Dugan", followed by the date "8/9/2022".

Shawn P. Dugan
Manager of RF Engineering, Central Region
T: (724) 416-9129
Shawn.Dugan@crowncastle.com

Exhibit D, MPE Study

RF Emissions Compliance Report

(next page)



WATERFORD

RF EMISSIONS COMPLIANCE REPORT

Prepared for:

Crown Castle
947 Parkview Boulevard
Lombard, IL 60148

Site:

Hinsdale Verizon 3x 6705 28GHz
53RD ST & LAWN AVE SC
WESTERN SPRINGS, COOK, IL
41.79339, -87.89946

August 16, 2022

This site will be in compliance with

FCC Regulations and MPE Limits:

**Crown Castle Is 0.718% of General Population (GP) Limit
(0.144% of Occupational (Occ) Limit)**

Certification

I have reviewed this RF Emissions assessment report and believe it to be both true and accurate to the best of my knowledge.



David Charles Cotton, Jr.
David Charles Cotton, Jr.
Licensed Professional Engineer
State of Illinois, 062.062055

Analysis completed using Waterford's NIERTool© software

Only clients and client representatives are authorized to provide input data through the Waterford web portal. In securing that authorization, clients and client representatives warrant the accuracy of all input data. Waterford Consultants, LLC attests to the accuracy of the engineering calculations. Waterford also attests that the results of those engineering calculations are correctly summarized in this report.

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7430 New Technology Way, Suite 150

Frederick, Maryland 21703

(703) 596-1022 Phone

www.waterfordconsultants.com

Control # 95915

RF EMISSIONS COMPLIANCE STATEMENT

Site:

**Hinsdale Verizon 3x 6705 28GHz
53RD ST & LAWN AVE SC
WESTERN SPRINGS, COOK, IL**

Compliance Statement

Subject site COMPLIES with Radiofrequency Radiation Exposure Limits of 47 C.F.R. §§ 1.1307(b)(3) and 1.1310.

Ground Level Site Summary

Predicted cumulative RF power density at ground level as a percentage of the FCC General Population limits. This result is the sum of the maximum ground level MPE for each RF emitter by band of operation. Sites below 100% are in full compliance.

Source	Predicted Power Density, % of Limit (GP)
Verizon 28000 MHz	0.718 %
Sum of Listed Sources	0.718%

Antenna Level Site Summary

Predicted cumulative RF power density at elevated levels near the antenna(s) has been evaluated with respect to the FCC General Population limits. The mitigation measures recommended herein are necessary to achieve and maintain compliance at the site based on the following assessment:

Antenna Level Assessment

Signage directives for this report are specified in the Elevation Detail Plot which depicts predicted RF power density near the antenna as a percentage of the FCC General Population limits. Areas exceeding 100% of the General Population limits are depicted as blue. Any work required within areas exceeding 100% of the limits should be coordinated with wireless operators or performed by personnel trained in RF safety and equipped with personal protection equipment. Workers in areas depicted as green or clear will not be exposed to hazardous levels of RF energy and no action is required to maintain a safe working environment.

As shown in the Elevation Detail Plot, the following keep-back distances to the FCC limits have been determined:

Reference Level	Maximum Level: General Population (%)	Maximum Level: Occupational (%)
Ground Level	0.718	0.144
Antenna Level	193.403	38.681

Distance to FCC 100% MPE Limits at Antenna Level

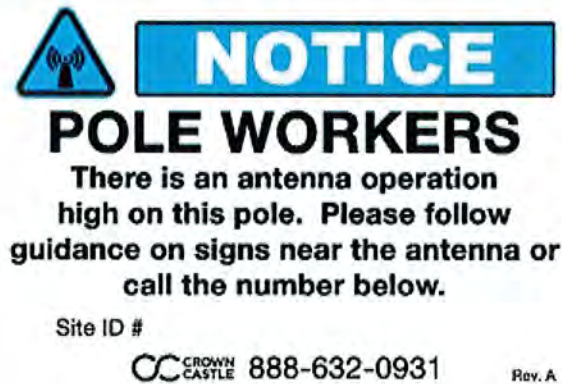
- Vertical Stand Off Distance (General Population) 3 feet
- Vertical Stand Off Distance (Occupational) N/A
- Horizontal Stand Off Distance (General Population) 3 feet
- Horizontal Stand Off Distance (Occupational) N/A

Distance to FCC 100% MPE Limits at Ground Level

- Horizontal Stand Off Distance (General Population) N/A
- Horizontal Stand Off Distance (Occupational) N/A

RF Alerting Signage

The "Notice" sign must be posted near the bottom of the pole or on the shroud any time there is a zone near the antenna that exceeds the General Population limit. This sign should be mounted where it is easily visible to workers on the ground as they approach the pole. Suggested locations include on the pole about 8-10' from the ground or on the front of the equipment shroud if it is mounted on the pole.



The "Caution" sign must be posted on the antenna any time there is an area that exceeds the FCC General Public exposure limit. The keep-back distance for the General Population limit must be filled in on the sign as depicted below. This sign must be mounted on or just below the radiating antenna so that it is maximally visible to workers approaching the antenna in a lift or bucket truck. If there is more than one radiating antenna and they are less than 5' apart then the sign should be mounted on or near the lower antenna. If there are multiple radiating antennas and they are >5' apart then separate signs should be mounted on or near each antenna.



Technical Framework: Basis for Compliance Statement

The compliance framework is derived from the Federal Communications Commission (FCC) Rules and Regulations for preventing human exposure in excess of the applicable Maximum Permissible Exposure (“MPE”) limits listed in Table 1 of 47 C.F.R. § 1.1310. Calculations using input data provided to Waterford by client or client's representative numerically confirm the subject site can operate at a 100% duty cycle without exceeding the FCC MPE limits in areas of uncontrolled access.

At this site, the radio frequency (RF) power density resulting from each transmitter at any location may be expressed as a percentage of the frequency-specific limits and added to determine if 100% of the exposure limit has been exceeded. The FCC Rules define two tiers of permissible exposure differentiated by the situation in which the exposure takes place and/or the status of the individuals who are subject to exposure. General Population / Uncontrolled exposure limits apply to those situations in which persons may not be aware of the presence of electromagnetic energy, where exposure is not employment related, or where persons cannot exercise control over their exposure. Occupational / Controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment, have been made fully aware of the potential for exposure, and can exercise control over their exposure. Based on the criteria for these classifications, continuous exposure to RF power density levels below the FCC General Population limits is not hazardous. The FCC General Population limits are 5 times more restrictive than the Occupational limits.

Frequency (MHz)	<i>Limits for General Population/ Uncontrolled Exposure</i>		<i>Limits for Occupational/ Controlled Exposure</i>	
	Power Density (mW/cm ²)	Averaging Time (minutes)	Power Density (mW/cm ²)	Averaging Time (minutes)
30-300	0.2	30	1	6
300-1500	f/1500	30	f/300	6
1500-100,000	1.0	30	5.0	6

In situations where the predicted MPE exceeds the General Population threshold in an accessible area because of emissions from multiple transmitters, FCC licensees that contribute greater than 5% of the aggregate MPE share responsibility for mitigation.

For any location where radiofrequency (RF) power densities exceed 100% MPE of the General Population limits, access controls with appropriate RF alerting signage must be available to be visible upon approach from any direction to provide notification of potential conditions within these areas. Subject to other site security requirements, occupational personnel should be trained in RF safety and equipped with personal protective equipment (e.g. RF personal monitor) designed for safe work in the vicinity of RF emitters. Waterford Consultants, LLC recommends that any work activity in these designated areas or in front of any transmitting antennas be coordinated with the wireless operators.

Predictive Modeling

Based on the computational guidelines set forth in FCC Office of Engineering and Technology, Bulletin 65 ("OET65"), Waterford Consultants, LLC has developed software to predict the overall MPE possible at any particular location given the spatial orientation and operating parameters of multiple RF sources. These theoretical results represent worst-case predictions as emitters are assumed to be operating at 100% duty cycle.

The tabular analysis in this report calculates the spatial peak power density produced at ground level from each RF emitter. The far field power density in milliWatts per square centimeter is expressed as $S_{ff} = 33.4 \times ERP / R^2$ where ERP is the Effective Radiated Power along a specific azimuth in Watts and R is the distance from the antenna radiation center in meters. The antenna manufacturer's horizontal and vertical radiation patterns have been considered in determining the ERP in any direction. This computation is based on the maximum ERP and includes a 1.6-fold increase in field strength due to ground reflection. The result provides a conservative estimate of spatially averaged power density at ground level and may be higher than predicted MPE in the graphical plots described below.

As the limits are frequency dependent, the contribution of any RF source at a specific location may be expressed as a percentage of the FCC General Population MPE limits at the associated operating frequency. The percentage contributions from all RF sources are added to determine the overall exposure level. If this result is less than 100%, the predicted cumulative exposure level is below the General Population limits set forth in the FCC Rules. The cumulative MPE depicted on the summary page is the summation of maximum MPE values for each emitter regardless of antenna orientation.

A graphical plot of calculated spatially averaged RF power density, based on the Cylindrical Model as described in OET65, predicts spatially averaged MPE conditions at areas in near proximity to the antenna. In the vertical display, predicted MPE is depicted at the center of the 6 ft vertical zone that a person could occupy.

Qualifications of Waterford

With more than 100 team-years of experience, Waterford Consultants, LLC [Waterford] provides technical consulting services to clients in the radio communications and antenna locating industry. Waterford retains professional engineers who are placed in responsible charge of the processes for analysis.

Waterford is familiar with 47 C.F.R. § § 1.1307(b)(3) and 1.1310 along with the general Rules, Regulations and policies of the FCC. Waterford work processes incorporate all specifications of FCC Office of Engineering and Technology, Bulletin 65 ("OET65"), from the website: www.fcc.gov/oet/rfsafety and follow criteria detailed in 47 CFR § 1.1310 "Radiofrequency radiation exposure Limits".

Within the technical and regulatory framework detailed above, Waterford developed tools according to recognized and generally accepted good engineering practices. Permissible exposure limits are band specific, and the Waterford computerized modeling tools correctly calculate permissible exposure based on the band(s) specified in the input data. Only clients and client representatives are authorized to provide input data through the Waterford web portal. In securing that authorization, clients and client representatives attest to the accuracy of all input data.

Waterford Consultants, LLC attests to the accuracy of the engineering calculations computed by those modeling tools. Furthermore, Waterford attests that the results of those engineering calculations are correctly summarized in this report.

Certification

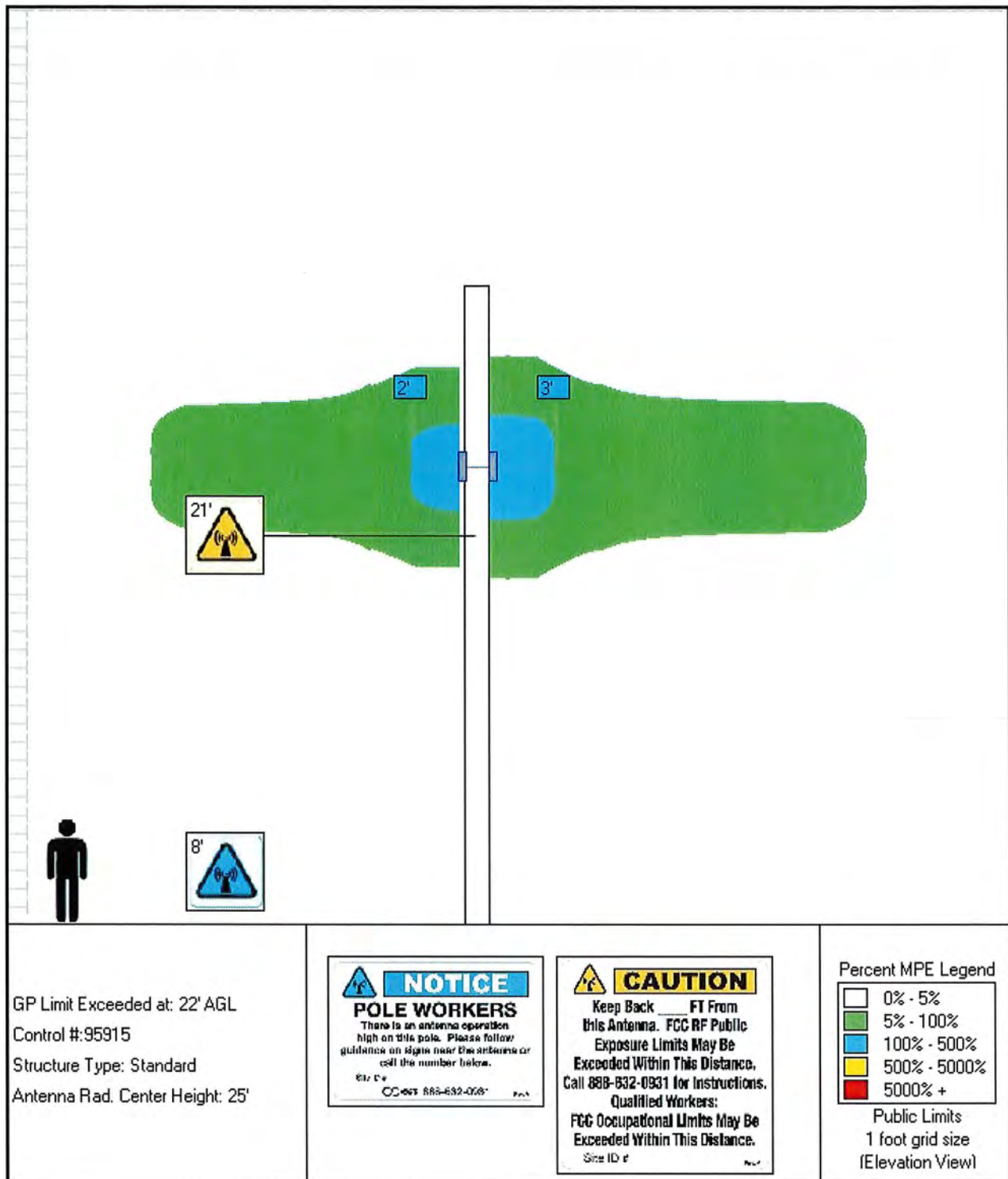
My stamp and signature on the cover indicates that I am fully aware of and familiar with the Rules and Regulations of both the Federal Communications Commissions (FCC) and the Occupational Safety and Health Administration (OSHA) with regard to Human Exposure to Radio Frequency Radiation, specifically in accordance with FCC's OET Bulletin 65. I have reviewed this Radio Frequency Exposure Assessment report and believe it to be both true and accurate to the best of my knowledge.

Antenna Inventory

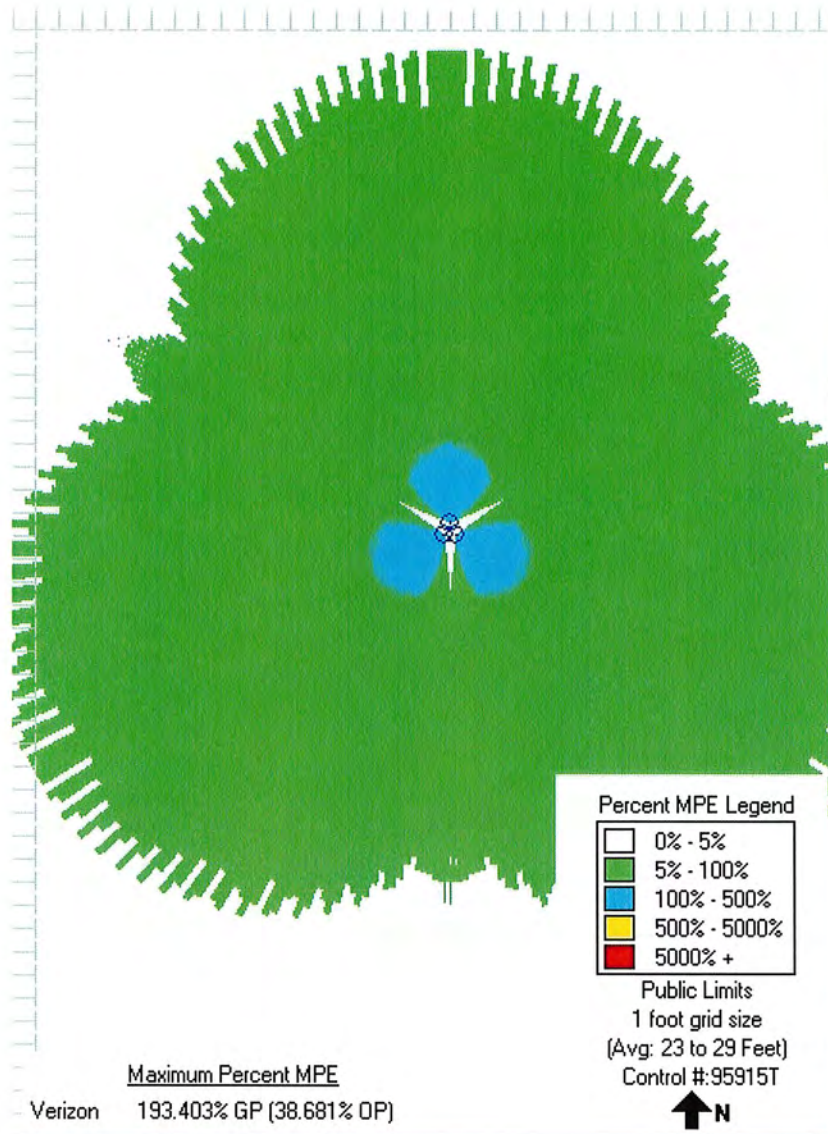
#	Operator	Make	Model	Freq (MHz)	Az (deg)	Tilt (deg)	HorBW (deg)	Ant (ft)	TPO (w)	Paths	Loss (db)	Ant Gain	Radiated Power (W)	RC AGL (ft)
1	Verizon	ERICSSON	SON_SM6705 CM2 02.07.22 28GHz VZW	28000	0	0	4	1.312	10	2	0	29.49dBd	794.000 EIRP	25
2	Verizon	ERICSSON	SON_SM6705 CM2 02.07.22 28GHz VZW	28000	120	0	4	1.312	10	2	0	29.49dBd	794.000 EIRP	25
3	Verizon	ERICSSON	SON_SM6705 CM2 02.07.22 28GHz VZW	28000	240	0	4	1.312	10	2	0	29.49dBd	794.000 EIRP	25

ELEVATION DETAIL

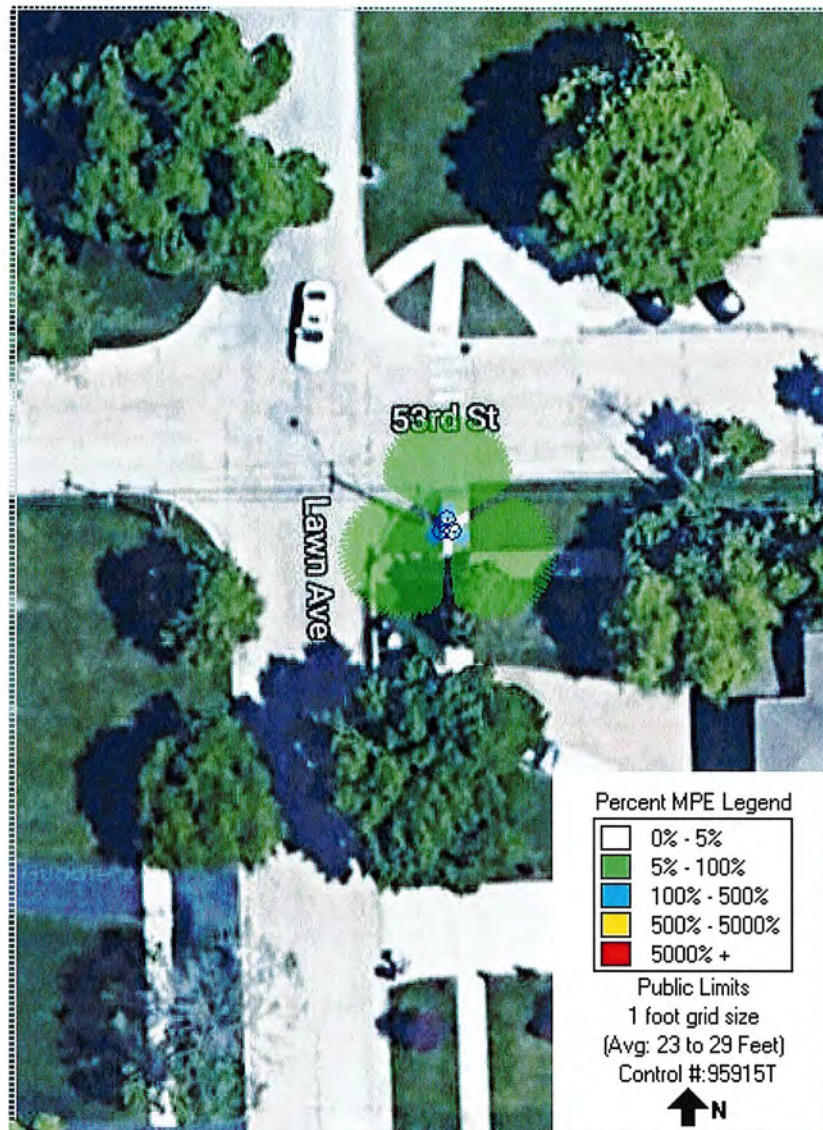
Predicted MPE depicted at the center of the 6 ft vertical zone that a person could occupy



TOP DOWN DETAIL



TOP DOWN DETAIL



GROUND LEVEL MPE BY RF EMITTER

The maximum ground level MPE along the azimuth of orientation for each RF emitter by band of operation is listed below. The computational approach is described in the Predictive Modeling section. The maximum MPE by operator and band is contributive to the cumulative ground level MPE summary table presented above.

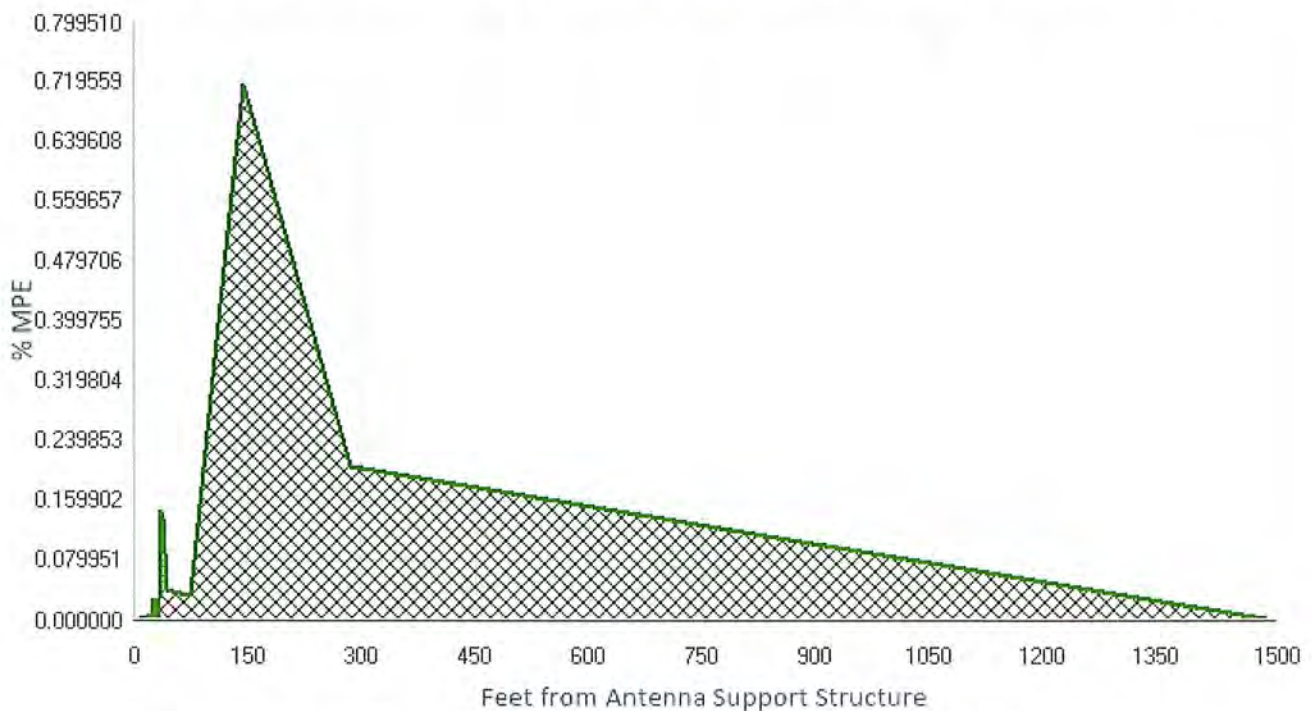
Verizon
Hinsdale Verizon 3x 6705 28GHz
ERICSSON - SON_SM6705 CM2 02.07.22 28GHz VZW 0° Sector

Maximum Exposure Limit - 28000 MHz

Limit (GP): 1000.000 $\mu\text{W}/\text{cm}^2$

EIRP	Height	Downtilt
(Watts)	(feet)	(Degrees)
794.000	25.000	0

Ground Level MPE as Percent of FCC General Population Limits



Maximum power density at ground level:

7.175 $\mu\text{W}/\text{cm}^2$

Highest percentage of Maximum Exposure Limit:

0.718 %

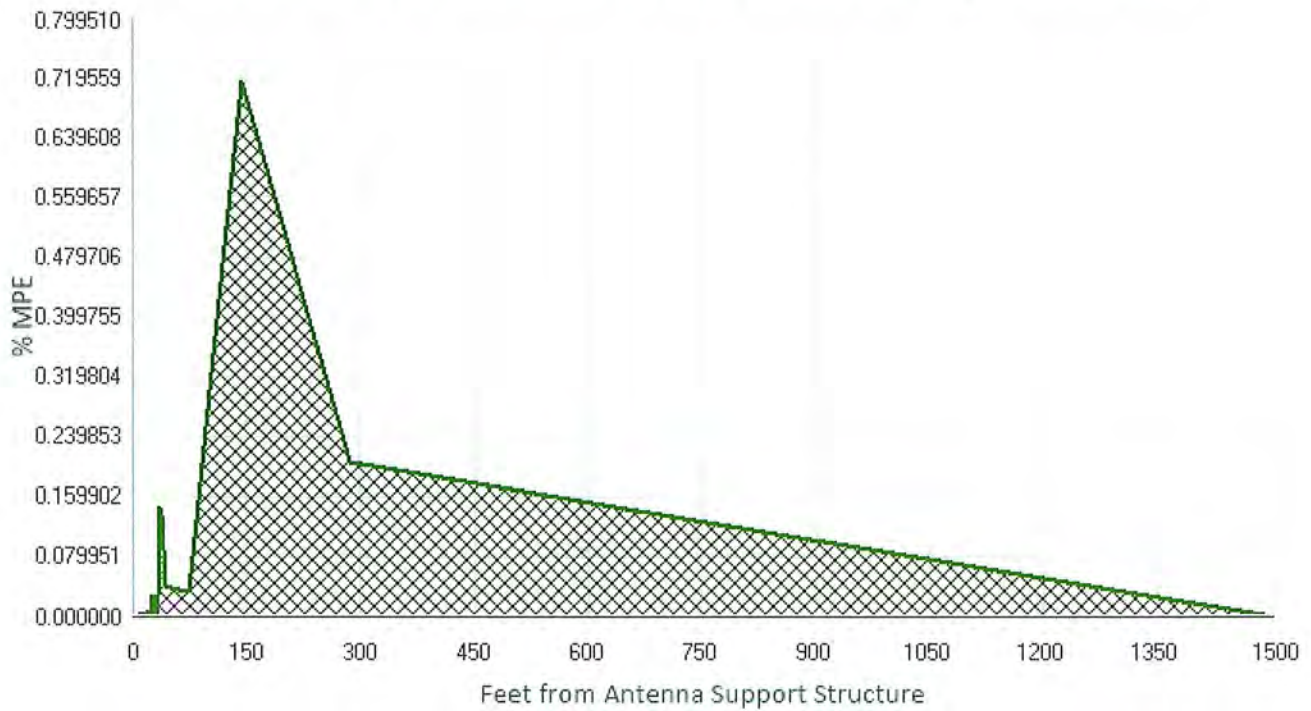
Verizon
Hinsdale Verizon 3x 6705 28GHz
ERICSSON - SON_SM6705 CM2 02.07.22 28GHz VZW 120° Sector

Maximum Exposure Limit - 28000 MHz

Limit (GP): 1000.000 $\mu\text{W}/\text{cm}^2$

EIRP	Height	Downtilt
(Watts)	(feet)	(Degrees)
794.000	25.000	0

Ground Level MPE as Percent of FCC General Population Limits



Maximum power density at ground level:

7.175 $\mu\text{W}/\text{cm}^2$

Highest percentage of Maximum Exposure Limit:

0.718 %

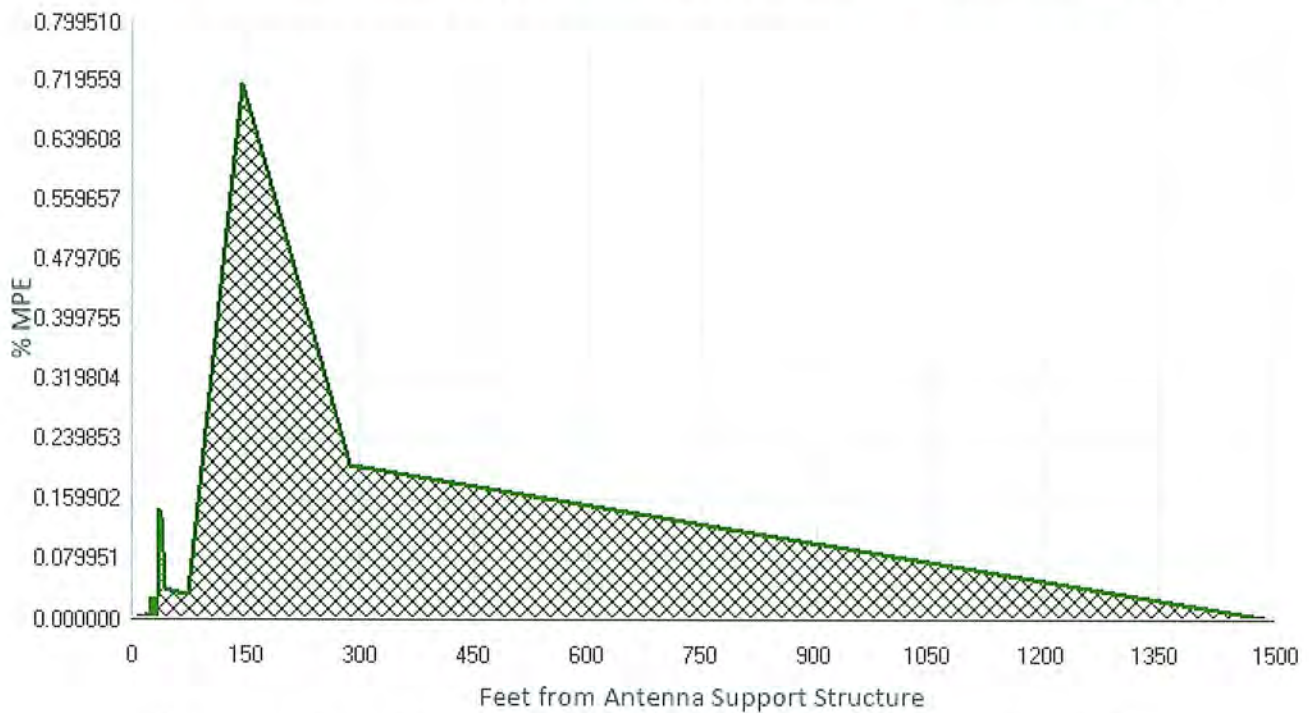
Verizon
Hinsdale Verizon 3x 6705 28GHz
ERICSSON - SON_SM6705 CM2 02.07.22 28GHz VZW 240° Sector

Maximum Exposure Limit - 28000 MHz

Limit (GP): 1000.000 $\mu\text{W}/\text{cm}^2$

EIRP	Height	Downtilt
(Watts)	(feet)	(Degrees)
794.000	25.000	0

Ground Level MPE as Percent of FCC General Population Limits



Maximum power density at ground level:

7.175 $\mu\text{W}/\text{cm}^2$

Highest percentage of Maximum Exposure Limit:

0.718 %

Exhibit E, Map of Planned Nodes in Project

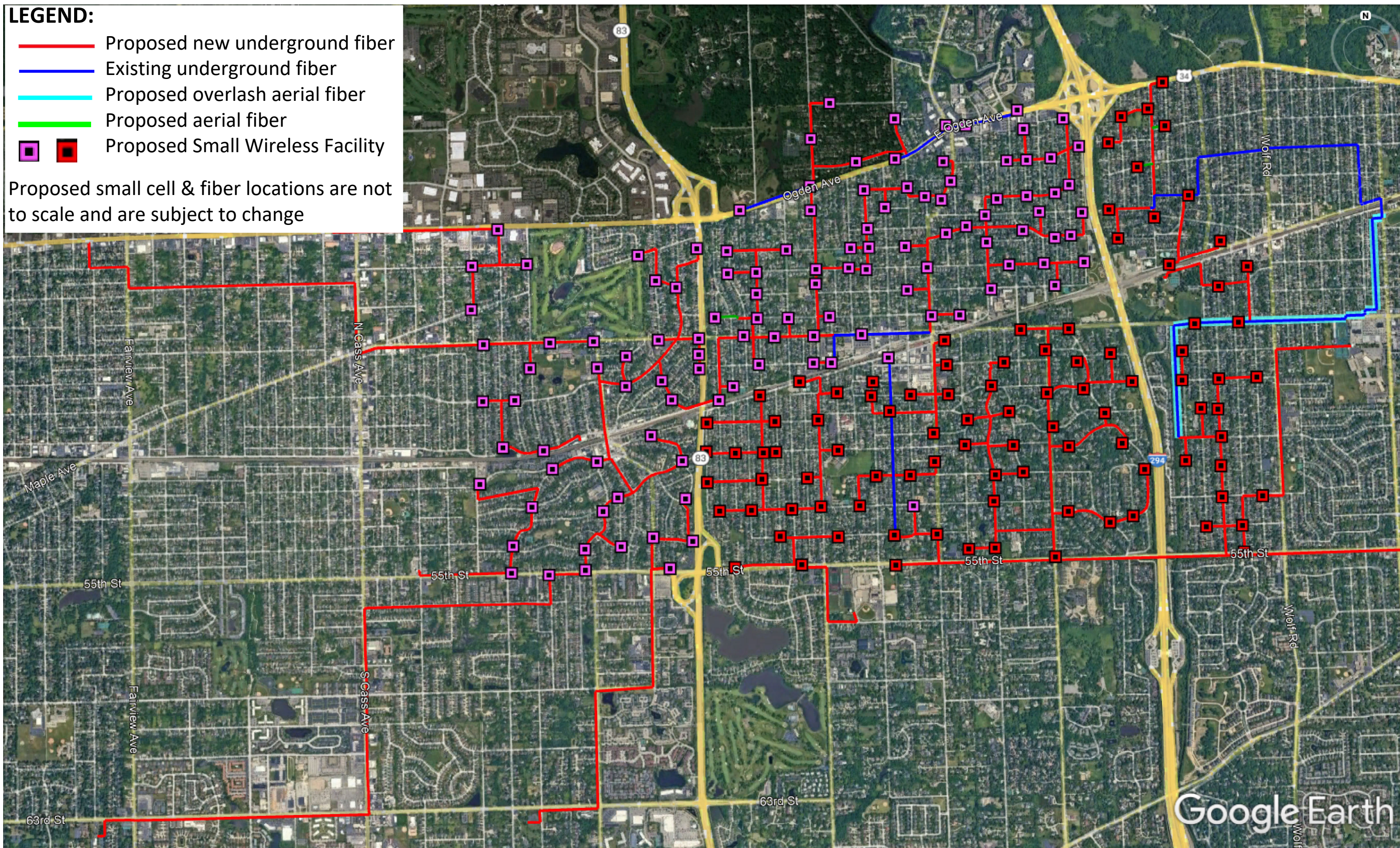
Master Plan

(next page)

LEGEND:

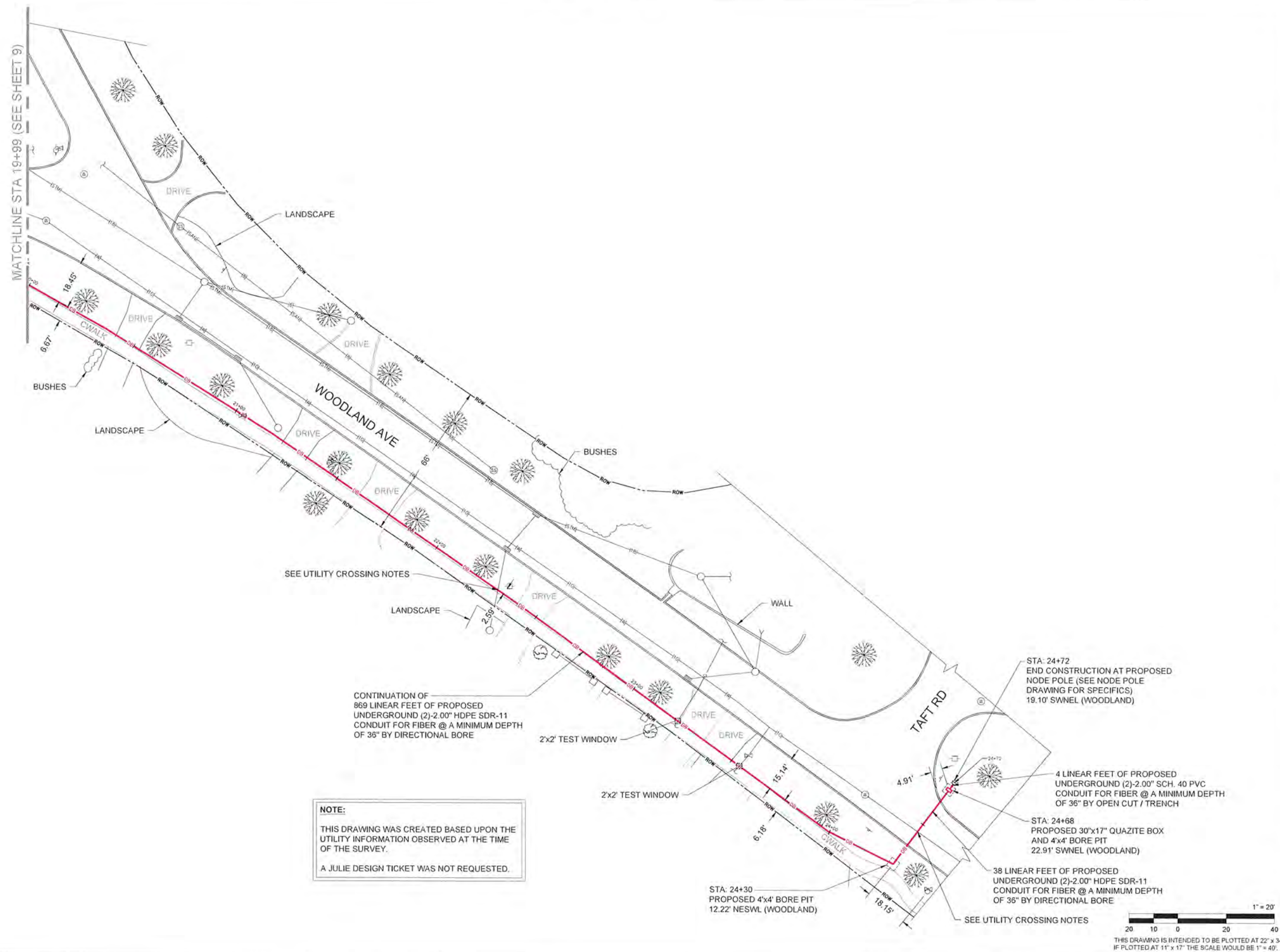
- Proposed new underground fiber
- Existing underground fiber
- Proposed overlash aerial fiber
- Proposed aerial fiber
- Proposed Small Wireless Facility

Proposed small cell & fiber locations are not to scale and are subject to change



Fiber Design
(proposed underground fiber route)
(existing underground utilities)
(next page)

PLAN VIEW



DRAWING SCALE:
1" = 20'

ENGINEER:
CCSI
NETWORKS
A NETWORK-CONNEX COMPANY
5101 THATCHER RD.
DOWNERS GROVE, IL 60515
OFFICE 630.572.9999 • FAX 630.572.9998

OWNER:
CROWN CASTLE
CROWN CASTLE FIBER
3025 HIGHLAND PARKWAY
SUITE 400
DOWNERS GROVE, IL 60515

CONTRACTOR:

TBD

TITLE:

PROPOSED FIBER OPTIC
CONDUIT INSTALLATION

TAFT RD & WOODLAND AVE
HINSDALE, COOK, IL 60521

PROJECT
NUMBER: 2211-005-U03
DRAWN BY: SJP DATE DRAWN: 04/06/2022

NO.	DATE	DESCRIPTION	BY
1	04/19/22	CLIENT	SJP
	04/06/22	PERMIT	SJP
REVISIONS			

SHEET NUMBER

10
10 OF 11

Exhibit G, Certification of Compliance with National Electric Code

Certification of Compliance with the National Electric Code.

Crown Castle certifies that its construction will be in compliance with the National Electric Code.

Exhibit H, Certificate of Insurance

Crown Castle Certificate of Insurance

(next page)



CERTIFICATE OF LIABILITY INSURANCE

Page 1 of 2

DATE (MM/DD/YYYY)
08/16/2022

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

IMPORTANT: If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must have ADDITIONAL INSURED provisions or be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

PRODUCER Willis Towers Watson Northeast, Inc. c/o 26 Century Blvd P.O. Box 305191 Nashville, TN 372305191 USA	CONTACT NAME: Crown Castle International	
	PHONE (A/C, No, Ext):	FAX (A/C, No):
INSURED Crown Castle Inc. f/k/a Crown Castle International Corp. See Attached Named Insured List 8020 Katy Freeway Houston, TX 77024	E-MAIL ADDRESS: COIRequest@crowncastle.com	
	INSURER(S) AFFORDING COVERAGE	
	INSURER A: Continental Casualty Company	NAIC # 20443
	INSURER B: Berkshire Hathaway Specialty Insurance Com	22276
	INSURER C: Continental Insurance Company	35289
	INSURER D: Travelers Property Casualty Company of Ame	25674
INSURER E:		
INSURER F:		

COVERAGES**CERTIFICATE NUMBER:** W25672362**REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL SUBR INSD WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY <input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR	Y	7018331477	04/01/2022	04/01/2023	EACH OCCURRENCE \$ 2,000,000
	DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000					
	MED EXP (Any one person) \$ 5,000					
	PERSONAL & ADV INJURY \$ 2,000,000					
	GENERAL AGGREGATE \$ 4,000,000					
GEN'L AGGREGATE LIMIT APPLIES PER: <input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC						PRODUCTS - COMP/OP AGG \$ 4,000,000
OTHER:						\$
A	AUTOMOBILE LIABILITY <input checked="" type="checkbox"/> ANY AUTO <input type="checkbox"/> OWNED AUTOS ONLY <input type="checkbox"/> SCHEDULED AUTOS ONLY <input type="checkbox"/> HIRED AUTOS ONLY <input type="checkbox"/> NON-OWNED AUTOS ONLY	Y	BUA 7018331432	04/01/2022	04/01/2023	COMBINED SINGLE LIMIT (Ea accident) \$ 2,000,000
	BODILY INJURY (Per person) \$					
	BODILY INJURY (Per accident) \$					
	PROPERTY DAMAGE (Per accident) \$					
	\$					
B	<input checked="" type="checkbox"/> UMBRELLA LIAB <input checked="" type="checkbox"/> OCCUR <input type="checkbox"/> EXCESS LIAB <input type="checkbox"/> CLAIMS-MADE	Y	47-UMO-303445-08	04/01/2022	04/01/2023	EACH OCCURRENCE \$ 5,000,000
	AGGREGATE \$ 5,000,000					
	\$					
C	WORKERS COMPENSATION AND EMPLOYERS' LIABILITY ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH) If yes, describe under DESCRIPTION OF OPERATIONS below	Y/N <input checked="" type="checkbox"/> No	WC7018331446	04/01/2022	04/01/2023	<input checked="" type="checkbox"/> PER STATUTE <input type="checkbox"/> OTH-ER
	E.L. EACH ACCIDENT \$ 1,000,000					
	E.L. DISEASE - EA EMPLOYEE \$ 1,000,000					
	E.L. DISEASE - POLICY LIMIT \$ 1,000,000					
D	All Risk Personal Property 100% Replacement Cost		QT-630-5D736475-TIL-22	04/01/2022	04/01/2023	Limit: \$250,000

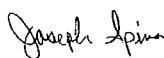
DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (ACORD 101, Additional Remarks Schedule, may be attached if more space is required)

This Voids and Replaces Previously Issued Certificate Dated 08/16/2022 WITH ID: W25671570.

Re: 61621154- SEC 7, T38N-R12E,

HINSDALE, COOK COUNTY, ILLINOIS (new Wood Utility pole approximately 45' east of the intersection of Woodland Ave & Taft Road)

CERTIFICATE HOLDER**CANCELLATION**

Village of Hinsdale, IL. 10455 S. Ridgeland Avenue Chicago Ridge, IL 60415	SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.
	AUTHORIZED REPRESENTATIVE 

© 1988-2016 ACORD CORPORATION. All rights reserved.

AGENCY CUSTOMER ID: _____

LOC #: _____

**ADDITIONAL REMARKS SCHEDULE**Page 2 of 2

AGENCY Willis Towers Watson Northeast, Inc.		NAMED INSURED Crown Castle Inc. f/k/a Crown Castle International Corp. See Attached Named Insured List	
POLICY NUMBER See Page 1		8020 Katy Freeway Houston, TX 77024	
CARRIER See Page 1	NAIC CODE See Page 1	EFFECTIVE DATE: See Page 1	

ADDITIONAL REMARKS

THIS ADDITIONAL REMARKS FORM IS A SCHEDULE TO ACORD FORM,

FORM NUMBER: 25 FORM TITLE: Certificate of Liability Insurance

Re: Permit Requirement

Village of Hinsdale and its appointed and elected officials, officers, president and trustees, employees, attorneys, engineers, and agents are included as Additional Insureds under the General Liability, Automobile and Umbrella Liability on a Primary and Noncontributory basis.

Named Insured	Named Insured (cont.)
AirComm of Avon, LLC	Crown Castle Solutions LLC
Assurable Insurance LLC	Crown Castle South LLC
Atlantic Coast Communications LLC	Crown Castle Towers 05 LLC
CC Edge LLC	Crown Castle Towers 06-2 LLC
CC Holdings GS V LLC	Crown Castle Towers 09 LLC
CC Site Acquisitions II LLC	Crown Castle Towers LLC
CC Strategic Investment Corp.	Crown Castle USA Inc.
CC TM PA LLC	Crown Communication LLC
CC Towers Guarantor LLC	Crown Communication New York, Inc.
CC Towers Holding LLC	Fibertech Facilities Corp.
CCATT Holdings LLC	Global Signal Acquisitions II LLC
CCATT LLC	Global Signal Acquisitions III LLC
CCATT PR LLC	Global Signal Acquisitions IV LLC
CCGS Holdings Corp.	Global Signal Acquisitions LLC
CCPR VI Tower Newco LLC	Global Signal GP LLC
CCS & E LLC	Global Signal Holdings III LLC
CCTM Holdings LLC	Global Signal Operating Partnership, LP
CCTM1 LLC	GoldenState Towers LLC
CCTM2 LLC	GS Savings Inc.
CCTMO LLC	GSPN Intangibles LLC
ComSite Venture, Inc.	High Point Management Co. LLC
Coverage Plus Antennas Systems LLC	ICB Towers LLC
Crown Atlantic Company LLC	Interstate Tower Communications LLC
Crown Castle AS LLC	Intracoastal City Towers LLC
Crown Castle Atlantic LLC	Light Tower Clearinghouse LLC
Crown Castle CA Corp.	Md7 Capitol One, LLC
Crown Castle Fiber Enterprise LLC	MW Cell Reit 1 LLC
Crown Castle Fiber Holdings Corp.	MW Cell TRS 1 LLC
Crown Castle Fiber LLC	OP LLC
Crown Castle GS III Corp.	OP 2 LLC
Crown Castle GT Company LLC	Pinnacle Towers Acquisition Holdings LLC
Crown Castle GT Corp.	Pinnacle Towers Acquisition LLC
Crown Castle GT Holding Sub LLC	Pinnacle Towers Asset Holding LLC
Crown Castle Inc. f/k/a Crown Castle International Corp.	Pinnacle Towers Canada Inc.
Crown Castle International LLC	Pinnacle Towers III LLC
Crown Castle Investment Corp.	Pinnacle Towers Limited
Crown Castle Investment II Corp.	Pinnacle Towers LLC
Crown Castle MU LLC	Pinnacle Towers V Inc.
Crown Castle MUPA LLC	PR Site Development Corporation
Crown Castle NG East LLC	Radio Station WGLD LLC
Crown Castle Operating Company	Shaffer & Associates, Inc.
Crown Castle Operating LLC	Sidera Networks UK Limited (UK)
Crown Castle Orlando Corp.	Sierra Towers, Inc.
Crown Castle PR LLC	Tower Development Corporation
Crown Castle PR Solutions LLC	Tower Systems LLC
Crown Castle Puerto Rico Corp.	Tower Technology Company of Jacksonville LLC

Named Insured	Named Insured (cont.)
Tower Ventures III LLC	Fiber Technologies Networks, L.L.C. (NY)
TowerOne Partners, LLC	Fibernet Direct Florida LLC
TriStar Investors LLC	Fibernet Direct Holdings LLC
TVHT LLC	Fibernet Direct TEL LLC
WCP Wireless Lease Subsidiary, LLC	Fibernet Direct Texas LLC
WCP Wireless Site Funding LLC	Fibertech Holdings Corp.
WCP Wireless Site Holdco LLC	Fibertech Networks, LLC
WCP Wireless Site Non-RE Funding LLC	Freedom Telecommunications, LLC
WCP Wireless Site Non-RE Holdco LLC	Global Signal Services LLC
WCP Wireless Site RE Funding LLC	InfraSource FI, LLC
WCP Wireless Site RE Holdco LLC	InSITE Fiber of Virginia LLC
Merged Entities to Crown Castle Fiber LLC	InSITE Solutions LLC
24/7 Chesapeake Holdings, LLC	IX2 Center, LLC
24/7 Mid-Atlantic Network of Virginia, LLC	IX2 Wilshire, LLC
24/7 Mid-Atlantic Network, LLC	JBCM Towers LLC
Access Fiber Group Holdings LLC	Light Tower Fiber New York, Inc. (NY)
Access Fiber Group, Inc.	Light Tower Holdings LLC
CA - CLEC LLC	Light Tower Management, Inc.
CC Castle International LLC	Light Tower Metro Fiber LLC
CC Edge Solutions LLC	Lighttower Fiber Infrastructure Corp.
CC Finance LLC	Lighttower Fiber Networks I, LLC
CC FN Holdings LLC	Lighttower Fiber Networks II, LLC n/k/a Crown Castle Fiber LLC
CC Sunesys Fiber Networks LLC	LL Q1-18, LLC
CC TS LLC	LTS Buyer LLC
CCPE Acquisitions LLC	LTS Group Holdings LLC n/k/a Crown Castle Fiber Holdings Corp
CCT2 Holdings LLC	LTS Intermediate Holdings A LLC
Chesapeake Fiber, LLC	LTS Intermediate Holdings B LLC
Coastal Antennas LLC	LTS Intermediate Holdings C LLC
Cross Connect Solutions, Inc. (PA)	Mobile Media California LLC
Crown Castle Atlantic LLC	Mobile Media National LLC
Crown Castle Augusta LLC	Modeo LLC
Crown Castle BP ATT LLC	NEON Transcom, Inc.
Crown Castle International Corp. de Puerto Rico	NewPath Networks Holding LLC
Crown Castle MM Holding Corp.	NewPath Networks LLC
Crown Castle MM Holding LLC	NY - CLEC LLC
Crown Castle NG Atlantic LLC	P3 CHB-1, LLC
Crown Castle NG Central LLC	P3 Holdings 2014 LLC
Crown Castle NG Networks LLC	P3 OASA-1, LLC
Crown Castle NG West LLC	P3 PBA-1, LLC
Crown Castle PT Inc.	PA - CLEC LLC
Crown Castle Services LLC	Pinnacle San Antonio L.L.C.
Crown Castle TDC LLC	Pinnacle St. Louis LLC
Crown Castle TLA LLC	PR TDC Corporation
Crown Mobile Systems, Inc.	Princeton Ancillary Services II LLC
DAS Development Corporation	Princeton Ancillary Services III LLC

Named Insured	Named Insured (cont.)
RGP Tower Group, LLC	
Sidera Networks, Inc.	
Sunesys Enterprise LLC n/k/a Crown Castle Fiber Enterprise LLC	
Sunesys of Massachusetts, LLC	
Sunesys of Virginia, Inc.	
Sunesys, LLC	
Thunder Towers LLC	
TowerOne 2012, LLC	
TowerOne Allentown 001, LLC	
TowerOne Bethlehem 001, LLC	
TowerOne Doylestown, LLC	
TowerOne East Rockhill 001, LLC	
TowerOne Marple, LLC	
TowerOne Middletown 001, LLC	
TowerOne Middletown 002, LLC	
TowerOne Middletown 003, LLC	
TowerOne North Coventry, LLC	
TowerOne Richland, LLC	
TowerOne Upper Pottsgrove 002, LLC	
TowerOne Upper Pottsgrove, LLC	
TowerOne Warminster 001, LLC	
TowerOne Warrington 002, LLC	
Towers Finco II LLC	
Towers Finco III LLC	
Towers Finco LLC	
WA - CLEC LLC	
Wilcon Holdings LLC	
Wilcon Operations LLC	
Wilshire Connection, LLC	
Wilshire Services, LLC	
Wireless Funding, LLC	
Wireless Realty Holdings II, LLC	
Wireless Revenue Properties, LLC	
Yankee Metro Parent, Inc.	