AGENDA
CITY OF DOVER BOARD OF ADJUSTMENT
WEDNESDAY – July 20, 2011 9:00 AM – CITY HALL

ROLL CALL

APPROVAL OF AGENDA

APPROVAL OF MINUTES OF May 18, 2011 MEETING

NEW BUSINESS

Applicant #V-11-06:
889 N. DuPont Hwy, PIP Enterprises, LLC has requested a variance from the requirements of Article 4 §4.15 of the *Zoning Ordinance* pertaining to the height of buildings for the C-4 Zone.

Subject property is zoned C-4 (Highway Commercial Zone) and subject to the SWPOZ (Source Water Protection Overlay Zone) Tier 3 Excellent Recharge Area and the Tax Parcel ID # is ED05-057.00-01-38.00. The owner of record is PIP Enterprises.

ADJOURN
29 Del.C. § 10004(e)(2)

THE AGENDA ITEMS MAY NOT BE CONSIDERED IN SEQUENCE. THIS AGENDA IS SUBJECT TO CHANGE TO INCLUDE THE ADDITION OR THE DELETION OF ITEMS, INCLUDING EXECUTIVE SESSIONS.

CITY OF DOVER
BOARD OF ADJUSTMENT
May 18, 2011

A Regular Meeting of the City of Dover Board of Adjustment was held on Wednesday, May 18, 2011 at 9:00 AM with Chairman Sheth presiding. Members present were, Mr. Sheth, Mr. Senato, Mr. Keller, and Mr. Hufnal. Colonel Ericson was absent.

Staff members present were Ms. Cornwell, Mr. Albert, Ms. Metsch and Mr. Rodriguez. Also present was Mr. William F. Holden, Mr. Charles Grimes and Mr. Keith Grimes.

APPROVAL OF AGENDA

Mr. Senato moved to approve the agenda as submitted, seconded by Mr. Hufnal and the motion was unanimously carried 4-0 with Colonel Ericson absent.

APPROVAL OF THE REGULAR BOARD OF ADJUSTMENT MEETING MINUTES OF APRIL 20, 2011

Mr. Keller stated that he has submitted to Staff a few typing errors and a word change located on Pages #4 and #5. Mr. Keller moved to approve the minutes as amended, seconded by Mr. Senato and the motion was unanimously carried 4-0 with Colonel Ericson absent.

OPENING REMARKS CONCERNING DEVELOPMENT APPLICATIONS

Ms. Cornwell presented to the audience the policies and procedures that would be followed during these hearings.

Applicant #V-11-04:

640 S. Governors Avenue, Holden Leasing, LLC has requested a variance from the requirements of Article 4 §4.15 of the *Zoning Ordinance* pertaining to the front yard set-back for the C-3 Zone.

Subject property is zoned C-3 (Service Commercial Zone) and the Tax Parcel ID #'s are ED05-077.13-01-40.00 and ED05-077.13-01-41.00. The owner of record is Holden Leasing, LLC.

Representative: Mr. William F. Holden, Property Owner.

Ms. Cornwell provided an overview of the application. Staff submitted for the record the staff report, architectural elevations, site plan, photographs, and diagrams provided by the applicant.

Ms. Cornwell stated that legal notice was published in the Delaware State News on May 8, 2011, and the public was notified in accordance with the regulations.

Mr. Sheth questioned if there were any Board members with a conflict of interest and there was none.

Mr. Holden stated that he does not have a formal presentation to make here this morning. The facts as presented in the written presentation are what they are. He does need to correct one inaccuracy. In their opening paragraph under "background" he will provide a short explanation

as to why this needs to be corrected. His architect, Gregory Kindig, wrote the first paragraph, I (Mr. Holden) wrote the second paragraph and then Mr. Kindig wrote the rest of it. He did not think too much about the fact that the building was not on its original setback line. In 1972 the showroom which is the north portion of the property, was added to the original structure. About three (3) weeks ago a customer came up to him and handed him a picture of their gas pumps which had been taken from the south looking north. He pointed out that it looks like it used to be a gas station which it probably was. In that photograph, he noted that the showroom was sticking out approximately five (5) feet further than the original structure was.

Mr. Holden further stated that he emailed Staff to advise of this correction and at that late hour as it was either May 6th or May 7th, the statement was not corrected for the record. He wanted to make this clear, if your decisions are based upon the fact that the building was on its original setback line, it was not. The showroom was added in 1972 and when the renovation to the south side, which is the service side of the building, was made in the early 80's, it was moved out to match the setback on the showroom side. It now sits about two (2) inches over the original setback line. In 1945 there was no setback line.

Ms. Cornwell stated that the building is still considered legal non-conforming with regards to setback. Even if it was added onto in 1972, today it would still be considered legal non-conforming.

Mr. Keller stated on one of the exhibits provided, the new façade and the archway will protrude approximately one (1) foot two (2) inches is this your understanding? Responding to Mr. Keller, Mr. Holden stated that yes that is correct. The reason for the extra two (2) inches is that it requires a foundation. It is the foundation itself that will be one (1) foot two (2) inches.

Mr. Keller further stated for clarification on Mr. Richard Vetter's survey layout plan, it does appear as though there is an encroachment into the existing setback line of approximately 6/10 of a foot. Is this what Staff is also stating? Responding to Mr. Keller, Ms. Cornwell stated that yes; there is an existing encroachment into the front yard setback. The variance would be for an additional one (1) foot two (2) inches.

Mr. Keller further questioned with regards to the exhibit for façade renovations, there is an engineering note "due to existing setback limitations, arch to be attached to existing building façade with minimal stand-off." Is this an alternative plan if your application plan for a variance would be denied? Would it be put on the face of the existing façade and not have the one (1) foot two (2) inch protrusion? Responding to Mr. Keller, Mr. Holden stated when the architectural rendering was done there was no consideration for not having it protrude. When he talked to Staff, he asked the architect if there were any flush alternatives. We have not done any formal architectural drawings of the flush alternative. His comment to Staff and to the architect is that any effort to make it appear that it is a standalone arch i.e., mounting it flush to the building is obviously going to be faux. This arch in and of it itself is going to cost $50,000. He does not want to spend $50,000 on something that would be aesthetically much worse looking than having it protrude. He has an architectural sketch of what he suggests we could possibly do and it obviously looks faux.

Mr. Keller further stated that regarding your current term agreement with Chrysler Corporation, how long is the term agreement? Responding to Mr. Keller, Mr. Holden stated that he did not want to cloud this request with a lot of legalese. He has all the term agreements in writing and can provide them if you need them at a later time. A term agreement is an agreement that is worked out between myself, the franchisee and the franchisor. The length of time all depends on how long it will take to do all the things necessary to meet the standards that Chrysler requires in this case. His term agreement expires January 1, 2012. The term agreement started in July 2009 so he has had two and a half years. In the process, we have been diligently searching for a property to move to. We found a couple of properties; however, financially the numbers just do not seem to work. He cannot push this back any further with Chrysler.

Mr. Senato questioned what the impact would be if this was not granted regarding the arch and effect on the business? Responding to Mr. Senato, Mr. Holden stated that he has not approached Chrysler on what their reaction would be to having to install a flush arch. He has talked to their dealer standards people. There are two separate issues since you asked a business question. Our manufacturer has a set of dealer standard requirements one of which is having the millennium arch as presented in the architectural drawings and the Chrysler design intent drawings. They have a graded scale that takes in a number of issues; how we treat our customers, how we follow-up, how we make appointments, and how we communicate our facility as far as its capacity. On the business side of it, we can earn as much as $50,000 a quarter if we meet those standards. If he does not install the millennium arch as it is presented, it does not meet dealer standards.

Mr. Sheth opened a public hearing and after seeing no one wishing to speak closed the public hearing.

Mr. Sheth questioned if there was any correspondence received for this application and there was none.

Mr. Senato moved to approve Applicant #V-11-04 located at 640 S. Governors Avenue, Holden Leasing, LLC for the arch as he feels that the applicant has demonstrated Exceptional Practical Difficulty due to the fact that the building encroaches into the front yard setback and is required by Chrysler, for the franchise, to have that type of arch.

Mr. Hufnal stated that he would like to add to the motion that Staff has already agreed that the existing building is considered legal non-conforming and it currently already encroaches into the front yard setback. The additional fourteen (14) inches into the front yard would not impact surrounding uses and would not be noticeable to surrounding properties. The motion was seconded by Mr. Hufnal with this addition and the motion was unanimously carried 4-0 with Colonel Ericson absent.

Applicant #V-11-05:
29 S. West Street, Grimes Family Limited Partnership has requested a variance from the requirements of Article 5 §4.7 of the *Zoning Ordinance* pertaining to the size of permitted signage.

Subject property is zoned C-2A (Limited Central Commercial Zone) and the Tax Parcel ID # is ED05-076.08-06-05.00. The owner of record is Grimes Family Limited Partnership.

Representatives: Mr. Charles Grimes and Mr. Keith Grimes, Property Owners.

Ms. Cornwell provided an overview of the application. Staff submitted for the record the staff report, application, and photographs.

Ms. Cornwell stated that legal notice was published in the Delaware State News on May 8, 2011, and the public was notified in accordance with the regulations.

Mr. Sheth questioned if there were any Board members with a conflict of interest and there was none.

Mr. Charles Grimes stated their big problem is where they are located. He understands that Downtown Loockerman Street, thirty-two (32) square feet is a lot of signage; however, they are in the middle of nowhere. They have the railroad tracks and a storage garage across from them and a junk yard located across the street. Their front door to Loockerman Street is 492 feet. From our front door to Division Street is 429 feet. From that distance, of one and a half football field length, if cars are coming down Division or Loockerman Street and this is our attraction, are they going to be able to see a sign that is fifteen (15) inches high from one and a half football field distance away?

Mr. Charles Grimes further stated that he has a drawing that they just received from the canopy contractor to put a canopy up. That was passed out at this time and submitted into the record. NAPA's theme across the United States is the pipeline of the automotive business and the yellow that you see on the drawing is nothing more than a pipeline that is lit up. We do not feel that with what is in front of us that we should be concerned about the public or that it is a bad or ugly sign. We just do not feel that anyone can see it. We were told that we could put up a monument sign that would be big enough; however, the problem would be that we do not feel that you would be able to see it if you are coming down Division or Loockerman Street. By the time you see this sign, you would already be across the railroad tracks and into Dover.

Mr. Keith Grimes stated that the building is 160 feet long. The first sign that we have is within requirements. We feel that the sign will get lost in such a large building. This is the size of the sign that we would like to put up as we do not feel that this is a huge sign. We just want to capture as much business as we can, especially with the move.

Mr. Sheth questioned how big the sign would be? Responding to Mr. Sheth, Mr. Charles Grimes stated that if you would include the yellow lighted sign it would be sixty-four (64) square feet. More than half of the sign is the yellow pipeline and red streak.

Ms. Cornwell stated that when she met with Mr. Charles Grimes in previous discussions Staff was not including the yellow pipeline as part of the signage. They were just going with the NAPA and then everything that says auto parts. Responding to Ms. Cornwell, Mr. Keith Grimes stated that in an email from Ms. Cornwell she had provided, excluding the yellow pipeline, the square footage which would be forty-seven (47) square feet.

Mr. Keller questioned to clarify the photograph that was just passed around it depicts the south end of the building, is this correct? Responding to Mr. Keller, Mr. Charles Grimes stated that the picture faces the west towards the railroad tracks.

Mr. Keller further stated that he has a depiction similar to the posted exhibit on a demonstration board that shows signage over what appears to be a front door entryway then a depiction of what he presumes is a monument sign. What, if any, existing signs are already up and established on the building? Responding to Mr. Keller, Mr. Charles Grimes stated that there is a sign over the entryway. This demonstration is only proposed signage there is none up now or currently in place.

Mr. Hufnal questioned if they would also be putting up a monument sign? Responding to Mr. Hufnal, Mr. Charles Grimes stated that no, they would not. They feel that with a monument sign by the time you see it, you are already at West Street so you would have missed it. The main signage is right over the front door.

Also responding to Mr. Hufnal, Mr. Keith Grimes stated that they were worried about putting the monument sign up because it would get damaged in this area that they are moving to.

Mr. Keller questioned Staff if the applicant foregoes a monument sign and would agree to forego that option as an alternative; does that change in any respect the allowable square footage on a wall sign? Responding to Mr. Keller, Ms. Cornwell stated that no it does not in this application; however, it could be something that this Board could consider.

Ms. Cornwell stated for clarification the permitted area for a sign is sixteen (16) square feet. When Staff originally met with the applicant, she originally stated thirty-two (32) square feet; however, upon further review and discussion with the Planning Director, it was determined that there is a house next door. The Code reads if there is a house with frontage within 200 feet on the same street which means that it is adjacent to residential; the overall sign area comes down to sixteen (16) feet. What they first submitted to Staff was a fifty-two (52) square foot sign and then they did submit that they had a twenty-eight (28) square foot sign for the wall sign. Neither would meet Code of sixteen (16) square feet.

Mr. Hufnal stated that he knows our Codes are designed to protect neighbors and neighboring properties; however, in this particular case, he knows where the building is and you cannot build anything across the road because it is along a railroad track and no one is going to see this unless you are going to be going down that street or you see it from a distance. A sixteen (16) square feet sign from 500 feet away is very difficult to see. You had originally requested fifty-six (56) square feet and now you are saying that it is forty-seven (47) square feet so that is reduced somewhat from your original request. If you do not put up the monument sign and you just go with the one sign, he feels because it is a lightly travelled street anyway and without anyone noticing where you are, they do need bigger signage.

Mr. Keller questioned how Mr. Grimes as the applicant would feel as a condition to the variance request that any future right to a monument sign would be waived if the variance was approved otherwise for a larger wall sign? Responding to Mr. Keller, Mr. Keith Grimes stated that they do not want to put up a monument sign because it would sustain physical damage. They are also

afraid of where the parking lot is located someone would back out into it as they get a lot of traffic that comes in with trailers hooked to them.

Mr. Keller further stated that if the variance is granted in whatever fashion and with whatever conditions would run with the land. In any event, if this were to be a condition that the subsequent owner could not erect a monument sign as well, would this create a problem? Responding to Mr. Keller, Mr. Charles Grimes stated that this would not create a problem.

Mr. Sheth questioned if the Downtown Dover Development Corporation has expressed any opinion one way or the other? Responding to Mr. Sheth, Ms. Cornwell stated that she does believe that the Planning Director did inform the Downtown Dover Partnership that there was a variance application for signage for the property. They are kept aware of all applications that come before any Board within the City. This was just an informational item for them.

Mr. Hufnal questioned if they have had any negative correspondence from anyone? Responding to Mr. Hufnal, Ms. Cornwell stated that there has been no correspondence regarding this application.

Mr. Sheth opened a public hearing and after seeing no one wishing to speak closed the public hearing.

Mr. Sheth questioned if there was any correspondence received for this application and there was none.

Mr. Senato moved to approve Application #V-11-05 located at 29 S. West Street, Grimes Family Limited Partnership for a forty-seven (47) square foot sign as they have demonstrated based on location in their discussion with this Board that they have Exceptional Practical Difficulty in that area with the sign and that the applicant will waive future rights to erect a monument sign, seconded by Mr. Hufnal and the motion unanimously carried 4-0 with Colonel Ericson absent.

Mr. Keller stated that with the testimony given and exhibits presented, he is not in total agreement that there is a demonstrated Exceptional Practical Difficulty. Likes and dislikes of location often times represent routine difficulties as opposed to an exceptional one. There are means and methods of vision for that building. The building in itself is of a size and nature in color that is an eye catching feature as you are traveling easterly on Loockerman or Division Street. Otherwise, he would agree that granting of the variance would represent minimal impact to surrounding properties. He would also state that with the imposition of the waiver of a future monument sign that fairness is exhibited.

Mr. Hufnal moved to adjourn the meeting, seconded by Mr. Senato and the motion was unanimously carried 4-0 with Colonel Ericson absent.

Meeting adjourned at 9:42 AM

Sincerely,

Diane Metsch
Secretary

City of Dover

Board of Adjustment

July 20, 2011

V-11-06

Location:	889 North DuPont Highway
Applicant:	Cellco Partnership
Owner:	PIP Enterprises, LLC
Tax Parcel:	ED-05-057.00-01-38.00-000
Application Date:	June 17, 2011
Present Zoning:	C-4 (Highway Commercial Zone)
Present Use:	Restaurant and retail store
Reviewed By:	Janelle M. Cornwell, AICP
Variance Type:	Area Variance
Variance Requested:	Allow a structure to exceed the maximum height of 45 feet. Allow for an additional 31 feet in height.

Project Description:
The applicant is requesting a variance from the *Zoning Ordinance* of Article 4 Section 4.15 Zoning Bulk and Parking Regulations. Specifically, they are requesting a variance to allow a structure to exceed the maximum height requirement by 31 feet for an overall height of 76 feet. The proposal is for a 70-foot cellular tower that has a six foot lightening rod attached to the top for a total height of 76 feet. The antenna will also exceed the 70-foot tower height.

Adjacent Land Uses
The adjacent properties are a mixture of commercial uses. The properties to the north and south are zoned C-4 (Highway Commercial Zone) and subject to the SWPOZ (Source Water Protection Overlay Zone). The properties to the east across North DuPont Highway are zoned IO (Institutional/Office Zone) and SC-2 (Neighborhood Shopping Center Zone) and subject to the SWPOZ (Source Water Protection Overlay Zone). The properties to the west

are zoned RC (Recreational and Commercial Zone) and subject to the SWPOZ (Source Water Protection Overlay Zone).

Code Citation

Article 4 Section 4.15
Bulk and parking regulations for highway commercial (C-4), [are as follows]:

	C-4
Minimum required:	
Lot area	
Lot width (ft.)	150
Lot depth (ft.)	150
Front yard (ft.)	30
Side yard (ft.)	25
Rear yard (ft.)	10 or equal to building height
Side or rear yards which adjoin a residence zone (ft.)	30
Off-street parking	
Per 300 sq. ft. floor area or	1 ½
Per employee (whichever is greater)	1
Maximum permitted:	
Building height	
Stories	4
Feet	45
Floor area ratio	2.0
Lot coverage	2.0
Lot coverage	

Exceptional Practical Difficulties Tests

Article 9, §2 dictates the specific powers and duties of the Board of Adjustment with regard to granting variances. In order to grant a variance the Board must determine in that exceptional practical difficulties exists.

Specifically the Board must determine:

2.1 Variance – The board shall have the authority to authorize variances from provisions of the zoning ordinance that are not contrary to public interest where the board determines that a literal interpretation of the zoning ordinance would result in undue hardship or exceptional practical difficulties to the applicant. In granting variances, the board shall determine that the spirit of the zoning ordinance is observed and substantial justice done.

2.11 Area Variance. A variance shall be considered an area variance if it relates to bulk standards, signage regulations, and other provisions of the zoning ordinance that address

lot layout, buffers, and dimensions. In considering a request for an area variance, the board shall evaluate the following criteria and document them in their findings of fact:

(a) the nature of the zone in which the property lies;
(b) the character of the immediate vicinity and the contained uses therein;
(c) whether, if the restriction upon the applicant's property were removed, such removal would seriously affect neighboring properties and uses; and
(d) whether, if the restriction is not removed, the restriction would create unnecessary hardship or exceptional practical difficulty for the owner in his efforts to make normal improvements in the character of that use of the property that is a permitted use under the provisions of the zoning ordinance.

1. The nature of the zone in which the property lies.
   Applicant Responses:
   The subject property lies within the C-4 ("Highway Commercial") zone. This zone permits a wide variety of significant commercial uses including, but not limited to, drive-in facilities, motels and restaurants, outdoor recreation facilities, theaters, and household moving and other storage operations. Commercial telecommunication towers are permitted in the C-4 zone subject (unless a variance is needed) only to administrative site plan approval, thus the proposed installation is consistent with the nature of the zone.

   Staff Response:
   The site is located within a commercial area of the city. There are commercial uses in the immediate vicinity of the site.

2. The character of the immediate vicinity and the contained uses therein.
   Applicant Responses:
   The subject property is located on Route 13 in the middle of an expansive, 6-lane stretch of commercial properties. The subject property contains J.D. Shuckers Restaurant, as well as a small 40-45 foot tall cellular monopole, and is bordered by Delaware State University to the west, strip shopping centers to the north, Home Depot, Dover Downs and the race track to the east, and additional commercial business to the south. A number of these sites contain tall structures such as signs, stadiums, light poles, bleaches for Dover Downs as well as the hotels itself such that a 75 foot tall monopole would not be out of character with what surrounds the property in this highly commercial area.

   Staff Response:
   The character of the vicinity is mixture of commercial, retail, and recreational uses. There are a number of buildings and structures (Dover Downs Hotel and Casino and the Racetrack) within the immediate vicinity that are over 45 feet in height. Some of these uses are zoned differently which allows for the different height limits.

3. Whether, if the restriction upon the applicant's property were removed, such removal would seriously affect neighboring properties and uses.
   Applicant Responses:

The applicant believes that the granting of this application would have no adverse impact of surrounding properties or uses. As the Board is likely aware, these installations take up minimal space. In this instance, the proposed installation is located at the rear of a developed commercial site with a background of taller structures behind it. As the attached photographs show, the area is decidedly commercial, with a number of buildings, light poles, signs and other structures in the area. The addition of a single, 70' monopole, roughly 3 feet in diameter (with six foot lightening rod at the top) will not be out of character with the area nor will it detract from the uses that currently are located in this area. In addition, this installation will serve to improve the quality of Verizon Wireless's coverage in this area by assisting in resolving current capacity shortfalls that exist in this heavily travelled area of Dover.

Staff Response:
The additional 31 feet in height would not impact surrounding uses. While the height would be noticeable there are other uses that are over 45 feet in the area. The location of the proposed cellular tower is at the back of the property next to an existing cellular tower with no impact on properties or uses.

4. Whether, if the restriction is not removed, the restriction would create unnecessary hardship or exceptional practical difficulty for the owner in his efforts to make normal improvements in the character of that use of the property that is a permitted use under the provisions of the zoning ordinance.

Applicant Responses:
The application is being pursued due to existing capacity concerns within Verizon Wireless's network. Previously, these concerns only manifested themselves during the race weekends at Dover Downs and they could be addressed through temporary facilities. These usage concerns, which result not only from cell phone calls but the increased use of text messaging, email and downloading capabilities provided by an expected from today's smartphones, have now risen to the extent that they are no longer just present on race weekends and can no longer be corrected through the use of temporary facilities. The radio frequency spectrum licensed to Verizon Wireless by the FCC is exhausted. To handle these issues, new sites are necessary to provide additional capacity for new and existing customers. Verizon Wireless has investigated whether the tower could work at 45 feet and determined that it simply will not provide the necessary offloading at any height less than 70 feet. If forced to maintain 45 feet in height, the required coverage footprint for offloading could not be met and the facility could not serve its intended purpose. Indeed, most of the Verizon Wireless locations in the area are established at 100 feet or higher.

Staff Response:
The denial of the variance requested would create an exceptional practical difficulty as this area is near capacity and will run out of capacity by the end of 2011, this could impact the quality of service and the ability to provide adequate service by the company limiting the normal improvements in the character of the use of the property. The denial of the variance could also create outages and interruptions for Verizon Wireless customers in the area that would also be an exceptional practical

difficulty as the company would be unable to do adequate business in the area. (As stated in the Radio Frequency Design Analysis Report)

Variance Recommendations:
Staff recommends approval of the area variance for reasons as follows:

- The applicant has demonstrated exceptional practical difficulty as a shorter cellular tower would limit the company's ability to "compete" with other similar companies, and it could impact the quality of the services provided.
- The variance would be in keeping with the character of the neighborhood as there are other structures within the neighborhood that are taller than the proposed cellular tower.
- The placement of a cellular tower is in keeping with the zone in which it is located as there is another cellular tower located on the property. Staff notes this tower is owned by a different telecommunications company.

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June 16, 2011
Claire DiNardo
Arionda, LLC
209 N. Haddon Avenue
Haddonfield, NJ 08033

Subject: **Electromagnetic Emissions Analysis**
"DOV - TOLSON"
889 Dupont Highway
Dover, DE 19901
Latitude: N 39º 11' 02.1"
Longitude: W 75º 31' 52.2"
Ground Elevation: 31.5' AMSL

Ms. DiNardo:

I have received and executed your request that I perform an independent evaluation and certification of the anticipated radio-frequency emission levels for the Verizon Wireless telecommunications facility upgrade proposed at the above referenced coordinates. The intention of this study is to verify compliance with Federal Communications Commission (hereafter "FCC") guidelines for human exposure limits to radio-frequency electromagnetic fields as per FCC Code of Federal Regulation 47 CFR 1.1307 and 1.1310. As a registered Professional Engineer, I am bound by a code of ethics to hold paramount the safety, health, and welfare of the public. All statements and calculations offered herein are made in an objective and truthful manner pursuant to that code.

Summary of Findings

The maximum exposure to radio-frequency emissions from the proposed Verizon Wireless and the existing AT&T facility immediately adjacent will be far below FCC exposure limits. **Using upper limit assumptions for the Verizon Wireless and AT&T equipment configurations, the cumulative radio-frequency exposure levels would be at least seventy (70) times less than the FCC limits at all locations of public access.** The following chart (Figure-1) specifically illustrates anticipated exposure levels for a variety of scenarios. All exposure limits have been calculated using the methods prescribed in FCC Office of Engineering and Technology (OET) Bulletin 65 "Evaluating Compliance with FCC Guidelines for Human Exposure to Radio-frequency Electromagnetic Fields". These upper-limit conditions include maximum traffic loading, significant subscriber growth, six degrees of main beam down-tilt, and 100% constructive interference from ground reflection. Additionally, signal attenuation due to environmental clutter such as buildings, trees, and roadways has been ignored which will

overestimate actual power densities. Also worth mentioning is the fact that the FCC exposure limits already include a significant margin of safety. Continuous exposure at 100% of FCC limit is considered by the scientific community to be just as safe as continuous exposure at 1% of FCC limit.

Horizontal Distance from Facility (Ft.)	Height Above Ground (Ft.)	Maximum Power Density µW/cm2 (micro-watts per square centimeter)						% of FCC Limit						Cumulative % of FCC limit across all bands
		90 MHz	700 MHz	850 MHz	1900 MHz	2100 MHz	2600 MHz	90 MHz	700 MHz	850 MHz	1900 MHz	2100 MHz	2600 MHz	
0	6	N/A	< 0.9	< 2.9	< 5.8	N/A	N/A	N/A	< 0.18	< 0.51	< 0.58	N/A	N/A	< 1.27
100	6	N/A	< 0.4	< 1.4	< 2.8	N/A	N/A	N/A	< 0.09	< 0.25	< 0.28	N/A	N/A	< 0.62
200	6	N/A	< 0.2	< 0.4	< 0.8	N/A	N/A	N/A	< 0.03	< 0.07	< 0.08	N/A	N/A	< 0.18
1320 (1/4 mi.)	6	N/A	< 0.1	< 0.1	< 0.1	N/A	N/A	N/A	< 0.01	< 0.01	< 0.01	N/A	N/A	< 0.03
FCC Exposure Limits for General Population		200 µW/cm²	467 µW/cm²	567 µW/cm²	1000 µW/cm²	1000 µW/cm²	1000 µW/cm²							

Figure-1 – calculated exposure levels near the proposed telecommunications facility

Applicability of the National Telecommunications Act of 1996

This Act states that "no state or local government or instrumentality thereof may regulate the placement, construction, and modification of personal wireless service facilities on the basis of the environmental effects of radio-frequency emissions to the extent that such facilities comply with the (Federal Communications) Commission's regulations concerning such emissions". As indicated above, this proposed facility will be in full compliance with the FCC's emissions standards and as such is beyond regulation in that regard.

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Technical Parameters of Consideration

The above calculations were based on the equipment configuration information furnished by representatives of Verizon Wireless. Specifically for this installation, Verizon Wireless plans to install panel style antennas arranged in three sectors with azimuths evenly spaced in the horizontal plane with respect to true north. The antenna centerline height above ground level is planned at 70'. Transmitting through these antennas will be up to four (4) CDMA radios in the 850 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio, up to four (4) CDMA radios in the 1900 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio and one (1) LTE radio in the 700 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio. Currently transmitting through the AT&T antennas installed (on the 45' wood pole immediately adjacent to the proposed) at an antenna centerline of 43' are a maximum of one (1) LTE radio in the 700 MHz band at a maximum of 100 watts ERP per radio, eight (8) GSM radios in the 850 MHz band at a maximum of 100 watts ERP per radio, a maximum of two (2) UMTS radio in the 850 MHz band at a maximum of 100 watts ERP per radio, a maximum of eight (8) GSM radios in the 1900 MHz band at a maximum of 100 watts ERP per radio and a maximum of two (2) UMTS radios in the 1900 MHz band at a maximum of 100 watts ERP per radio.

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Co-location of Other Wireless Providers
In an attempt to halt the proliferation of telecommunications structures and preserve as much of their natural landscape as possible many municipalities have adopted telecommunications ordinances that specifically require structures to accommodate additional wireless providers from a structural standpoint. **From the standpoint of radio-frequency exposure**, the installation of the proposed Verizon Wireless equipment would in no way preclude the use of this facility by other providers.

Background Information
In 1985, the FCC first adopted guidelines to be used for evaluating human exposure to RF emissions. The FCC revised and updated these guidelines on August 1, 1996, as a result of a rule-making proceeding initiated in 1993. The new guidelines incorporate limits for Maximum Permissible Exposure (MPE) in terms of electric and magnetic field strength and power density for transmitters operating at frequencies between 300 kHz and 100 GHz.

The FCC's MPE limits are based on exposure limits recommended by the National Council on Radiation Protection and Measurements (NCRP) and, over a wide range of frequencies, the exposure limits were developed by the Institute of Electrical and Electronics Engineers, Inc., (IEEE) and adopted by the American National Standards Institute (ANSI) to replace the 1982 ANSI guidelines. Limits for localized absorption are based on recommendations of both ANSI/IEEE and NCRP.

The FCC's limits, and the NCRP and ANSI/IEEE limits on which they are based, are derived from exposure criteria quantified in terms of specific absorption rate (SAR). The basis for these limits is a whole-body averaged SAR threshold level of 4 watts per kilogram (4 W/kg), as averaged over the entire mass of the body, above which expert organizations have determined that potentially hazardous exposures may occur. The MPE limits are derived by incorporating safety factors that lead, in some cases, to limits that are more conservative than the limits originally adopted by the FCC in 1985. Where more conservative limits exist, they do not arise from a fundamental change in the RF safety criteria for whole-body averaged SAR, but from a precautionary desire to protect subgroups of the general population who, potentially, may be more at risk.

The FCC exposure limits are also based on data showing that the human body absorbs RF energy at some frequencies more efficiently than at others. The most restrictive limits occur in the frequency range of 30-300 MHz where whole-body absorption of RF energy by human beings is most efficient. At other frequencies, whole-body absorption is less efficient, and consequently, the MPE limits are less restrictive.

MPE limits are defined in terms of power density (units of milliwatts per centimeter squared: mW/cm^2), electric field strength (units of volts per meter: V/m) and magnetic

field strength (units of amperes per meter: A/m). The far-field of a transmitting antenna is where the electric field vector (E), the magnetic field vector (H), and the direction of propagation can be considered to be all mutually orthogonal ("plane-wave" conditions).

Occupational / controlled exposure limits apply to situations in which persons are exposed as a consequence of their employment and in which those persons who are exposed have been made fully aware of the potential for exposure and can exercise control over their exposure. Occupational/controlled exposure limits also apply where exposure is of a transient nature as a result of incidental passage through a location where exposure levels may be above general population/uncontrolled limits, as long as the exposed person has been made fully aware of the potential for exposure and can exercise control over his or her exposure by leaving the area or by some other appropriate means.
General population / uncontrolled exposure limits apply to situations in which the general public may be exposed or in which persons who are exposed as a consequence of their employment may not be made fully aware of the potential for exposure or cannot exercise control over their exposure. Therefore, members of the general public would always be considered under this category when exposure is not employment-related, for example, in the case of a telecommunications tower that exposes persons in a nearby residential area. **In the case of this study, the general population exposure limits have been applied as they are the more conservative set of standards.**

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Additional Remarks

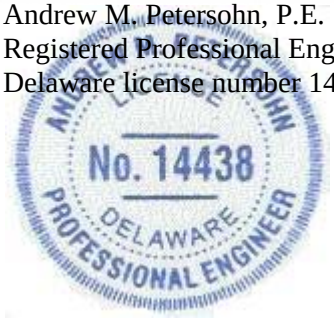
The radio-frequency emission levels from Verizon Wireless and other PCS and Cellular communications base stations are similar to that of other two-way communications systems like those used by police, fire and ambulance personnel. In contrast, commercial broadcast systems like television and radio often transmit at power levels ten times greater or more than the systems discussed above.

The biological effects on humans of non-ionizing radio-frequency exposure have been studied extensively now for decades. There have been thousands of reports produced by government agencies, universities, and private research groups that support the standards adopted by the FCC. **To date, there have been no credible studies conducted whose results showed evidence of any adverse health effects at the above exposure limits.**

Sincerely,



Andrew M. Petersohn, P.E.
Registered Professional Engineer
Delaware license number 14438



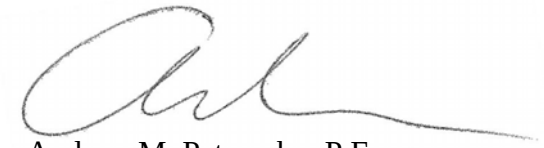
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DECLARATION OF ENGINEER

Andrew M. Petersohn, P.E., hereby states that he is a graduate telecommunications consulting engineer possessing Master and Bachelor Degrees in Electrical Engineering from Lehigh University (2005 and 1999, respectively). His corporation, dBm Engineering, P.C., has been retained by representatives of Verizon Wireless to perform an electromagnetic emissions analysis for a proposed telecommunications facility.

Mr. Petersohn also asserts that the calculations and/or measurements described in this report were made personally and in a truthful and objective manner. Mr. Petersohn is a Registered Professional Engineer licensed in Pennsylvania, Delaware, Maryland, Virginia, New York and Florida with pending reciprocity in New Jersey. He has over a decade of engineering experience in the field of wireless communications. Mr. Petersohn is an active member of the National Society of Professional Engineers (NSPE) and the Institute of Electronic and Electrical Engineers (IEEE). Mr. Petersohn further states that all facts and statements contained in the foregoing document are true and accurate to the best of his knowledge. He believes, under penalty of perjury, the foregoing to be correct.



Andrew M. Petersohn, P.E.
Registered Professional Engineer
Delaware license number 14438

Executed this the 16th day of June, 2011.

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June 16, 2011
Claire DiNardo
Arionda, LLC
209 N. Haddon Avenue
Haddonfield, NJ 08033

Subject: **FAA Screening**
Proposed Telecommunications Facility:
"DOV - TOLSON"
889 Dupont Highway
Dover, DE 19901
Latitude: N 39º 11' 02.1"
Longitude: W 75º 31' 52.2"
Ground Elevation: 31.5' AMSL

Ms. DiNardo:

I have received and executed the request that I perform an independent screening analysis of the proposed seventy (70') foot telecommunications facility at the above referenced coordinates. The intention of this study is to verify compliance with Federal Aviation Administration's (hereafter "FAA") guidelines for notice requirement as per Federal Aviation Regulation 77.13. As a registered Professional Engineer, I am bound by a code of ethics to hold paramount the safety, health, and welfare of the public. All statements and calculations offered herein are made in an objective and truthful manner pursuant to that code.

Summary of Findings
Based on the coordinates, ground elevation, and total structure height supplied by representatives of Verizon Wireless, this proposed facility does not exceed Federal Aviation Regulation 77.13 and, as such, **does not require filing with the FAA** of form 7460-1 "Notice of Proposed Construction" **and lighting of the facility is not required.** The Towair results are attached.

Sincerely,

ANDREW M. PETERSOHN LICENSE No. 14438 DELAWARE PROFESSIONAL ENGINEER

Andrew M. Petersohn, P.E.
Registered Professional Engineer
Delaware license number 14438

DETERMINATION Results

PASS SLOPE(100:1): NO FAA REQ-RWY MORE THAN 10499 MTRS & 7430.71 MTRS (7.43069 KM) AWAY

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	39-08-36.00N	075-27-46.00W	DOVER AFB	KENT DOVER, DE	6.4	3932.8000000000002

PASS SLOPE(100:1): NO FAA REQ-RWY MORE THAN 10499 MTRS & 6310.88 MTRS (6.31090 KM) AWAY

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	39-08-21.00N	075-29-10.00W	DOVER AFB	KENT DOVER, DE	6.4	3932.8000000000002

PASS SLOPE(100:1): NO FAA REQ-RWY MORE THAN 10499 MTRS & 6489.80 MTRS (6.48979 KM) AWAY

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	39-13-11.00N	075-35-26.00W	DELAWARE AIRPARK	KENT DOVER/CHESWOLD, DE	13.4	1091.8

PASS SLOPE(50:1): NO FAA REQ-RWY 10499 MTRS OR LESS & 4133.69 MTRS (4.13370) KM AWAY

Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
AIRP	R	39-11-57.00N	075-29-15.00W	CHANDELLE ESTATES	KENT DOVER, DE	6.7	772.10000000000002

PASS SLOPE(25:1): NO FAA REQ-HELIPORT 4425.69 MTRS (4.4257 KM) AWAY

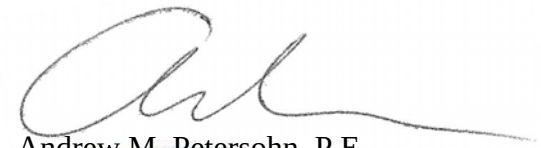
Type	C/R	Latitude	Longitude	Name	Address	Lowest Elevation (m)	Runway Length (m)
HELI	C	39-08-58.00N	075-30-18.00W	DELDOT HELISTOP	KENT DOVER, DE	9.1	18.300000000000001

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DECLARATION OF ENGINEER

Andrew M. Petersohn, P.E., hereby states that he is a graduate telecommunications consulting engineer possessing Master and Bachelor Degrees in Electrical Engineering from Lehigh University (2005 and 1999, respectively). His corporation, dBm Engineering, P.C., has been retained by representatives of Verizon Wireless to perform a Federal Aviation Administration screening analysis for a proposed telecommunications facility.

Mr. Petersohn also asserts that the calculations and/or measurements described in this report were made personally and in a truthful and objective manner. Mr. Petersohn is a Registered Professional Engineer licensed in Pennsylvania, Delaware, Maryland, Virginia, New York and Florida with pending reciprocity in New Jersey. He has over a decade of engineering experience in the field of wireless communications. Mr. Petersohn is an active member of the National Society of Professional Engineers (NSPE) and the Institute of Electronic and Electrical Engineers (IEEE). Mr. Petersohn further states that all facts and statements contained in the foregoing document are true and accurate to the best of his knowledge. He believes, under penalty of perjury, the foregoing to be correct.



Andrew M. Petersohn, P.E.
Registered Professional Engineer
Delaware license number 14438



Executed this the 16th day of June, 2011

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June 16, 2011
Claire DiNardo
Arionda, LLC
209 N. Haddon Avenue
Haddonfield, NJ 08033

Subject: **Interference Analysis for Proposed Telecommunication Facility**
"DOV - TOLSON"
889 Dupont Highway
Dover, DE 19901
Latitude: N 39º 11' 02.1"
Longitude: W 75º 31' 52.2"
Ground Elevation: 31.5' AMSL

Ms. DiNardo:

I have received and executed the request that I perform an independent evaluation of the potential for harmful interference generated by the proposed Verizon Wireless telecommunications facility at the above referenced location. The intention of this study is to determine if the manifestation of harmful interference is a viable concern through the close examination of the radio frequency (hereafter RF) parameters of the installation. As a registered professional engineer, I am bound by a code of ethics to hold paramount the safety, health, and welfare of the public. All statements and calculations offered herein are made in an objective and truthful manner pursuant to that code.

Summary of Findings
After close examination of the details of this proposal, it is my professional opinion that **no potential exists for the manifestation of harmful interference** as a result of the proposed Verizon Wireless telecommunications facility. My findings indicate that Verizon Wireless will be operating in full compliance with all applicable standards as outlined in their Federal Communications Commission licensure.

Sincerely,

Andrew M. Petersohn, P.E.
Registered Professional Engineer
Delaware license number 14438

Licensure Discussion

Verizon Wireless is bound by its Federal Communications Commission (hereafter FCC) licensure to transmit only the specific frequencies and power levels for which they are licensed. In Kent County, Delaware these licenses include the 'B' Cellular Band, the 'F' PCS band and the recently auctioned 'F' AWS, and 'A' and 'C' 700 MHz bands. Other communication facilities and services such as emergency responders, television broadcasting, AM/FM broadcasting, mobile to mobile radios, and home electronics operate at different frequencies, once again, allocated by the FCC. For this reason, the manifestation of **direct**, harmful interference is precluded by virtue of Verizon Wireless being the only entity licensed to utilize these specifically defined portions of the RF spectrum. As such, there will be no direct, significant radio frequency emissions that fall into any band other than that for which Verizon Wireless is licensed. However, when non-linear elements (such as amplifiers) are introduced in the RF path the possibility exists for **indirect** interference caused by harmonic and inter-modulated frequency emissions that may fall outside the licensed spectrum. Due to the fact that the harmonic and inter-modulated output of Cellular and PCS transmitters is extremely low (as required by FCC type approval), this only becomes a concern when there are multiple telecommunication installations in close proximity to one another. This problem is easily avoided by insuring adequate antenna separation when service providers co-locate on a structure; the industry standard of 10' between centerlines has proven adequate. In this case, the existing AT&T array is the only telecommunication installation in close proximity and the current configuration affords more than adequate separation to prevent any indirect interference. **In the unlikely event that future radio frequency interference is reported, it is Verizon Wireless policy to identify and mitigate any interference issues as quickly as possible.**

Facility Discussion

According to the information supplied by representatives of Verizon Wireless the proposed design for this facility includes a total of not more than twelve (12) panel style antennas arranged in three sectors at azimuths evenly spaced in the horizontal plane with respect to true north. The antenna centerline height above ground level is planned at 70'. Transmitting through these antennas will be up to four (4) CDMA radios in the 850 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio, up to four (4) CDMA radios in the 1900 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio and one (1) LTE radio in the 700 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio.

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Additional Remarks

The radio frequency emission levels from Verizon Wireless and other PCS and Cellular communications base stations are similar to that of other two-way communications systems such as those used by police, fire and ambulance personnel. In contrast, commercial broadcast systems such as television and radio often transmit at power levels ten times greater or more than the systems discussed above. Due to the relatively low power output, the potential for harmful interference is greatly reduced as the harmonic and inter-modulated emissions are typically in the noise floor of most receivers when only a few hundred feet away.

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DECLARATION OF ENGINEER

Andrew M. Petersohn, P.E., hereby states that he is a graduate telecommunications consulting engineer possessing Master and Bachelor Degrees in Electrical Engineering from Lehigh University (2005 and 1999, respectively). His corporation, dBm Engineering, P.C., has been retained by representatives of Verizon Wireless to perform an interference analysis for a proposed telecommunications facility.

Mr. Petersohn also asserts that the calculations and/or measurements described in this report were made personally and in a truthful and objective manner. Mr. Petersohn is a Registered Professional Engineer in Pennsylvania, New York, Maryland, Delaware, Florida and Virginia with pending reciprocity in New Jersey. He has over a decade of engineering experience in the field of wireless communications. Mr. Petersohn is an active member of the National Society of Professional Engineers (NSPE) and the Institute of Electronic and Electrical Engineers (IEEE). Mr. Petersohn further states that all facts and statements contained in the foregoing document are true and accurate to the best of his knowledge. He believes, under penalty of perjury, the foregoing to be correct.



Andrew M. Petersohn, P.E.
Registered Professional Engineer
Delaware license number 14438



Executed this the 16th day of June, 2011.

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June 30, 2011
Claire DiNardo
Arionda, LLC
209 N. Haddon Avenue
Haddonfield, NJ 08033

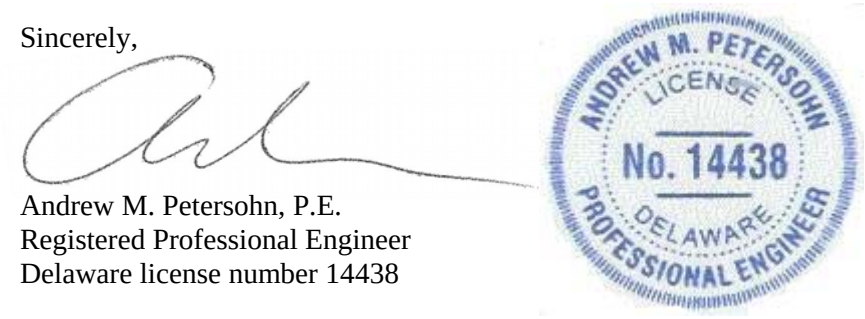
Subject: **Radio Frequency Design Analysis**
"DOV - TOLSON"
889 Dupont Highway
Dover, DE 19901
Latitude: N 39º 11' 02.1"
Longitude: W 75º 31' 52.2"
Ground Elevation: 31.5' AMSL

Ms. DiNardo:

I have received and executed the request that I perform an independent evaluation and design review for the Verizon Wireless telecommunications facility proposed at the above referenced coordinates. The intention of this study is to provide an objective, professional opinion regarding the proposal from a Radio Frequency design perspective. Specifically, how the site complements the existing network and what capacity objectives it fulfills. As a registered Professional Engineer, I am bound by a code of ethics to hold paramount the safety, health, and welfare of the public. All statements and calculations offered herein are made in an objective and truthful manner pursuant to that code.

Summary of Findings
In my professional opinion, the proposed facility is extremely well suited to provide enhanced network capacity for City of Dover. Specifically, the Verizon Wireless facilities serving North Dover that are trending toward capacity exhaustion will be effectively offloaded by the proposed. The proposal is the most effective means of satisfying the capacity demand in Dover and the location and proposed antenna height are the least intrusive means of providing adequate capacity for Verizon Wireless subscribers in the targeted portions of Dover. The designed antenna height is the absolute minimum acceptable in order to achieve a high percentage of the site's capacity goals.

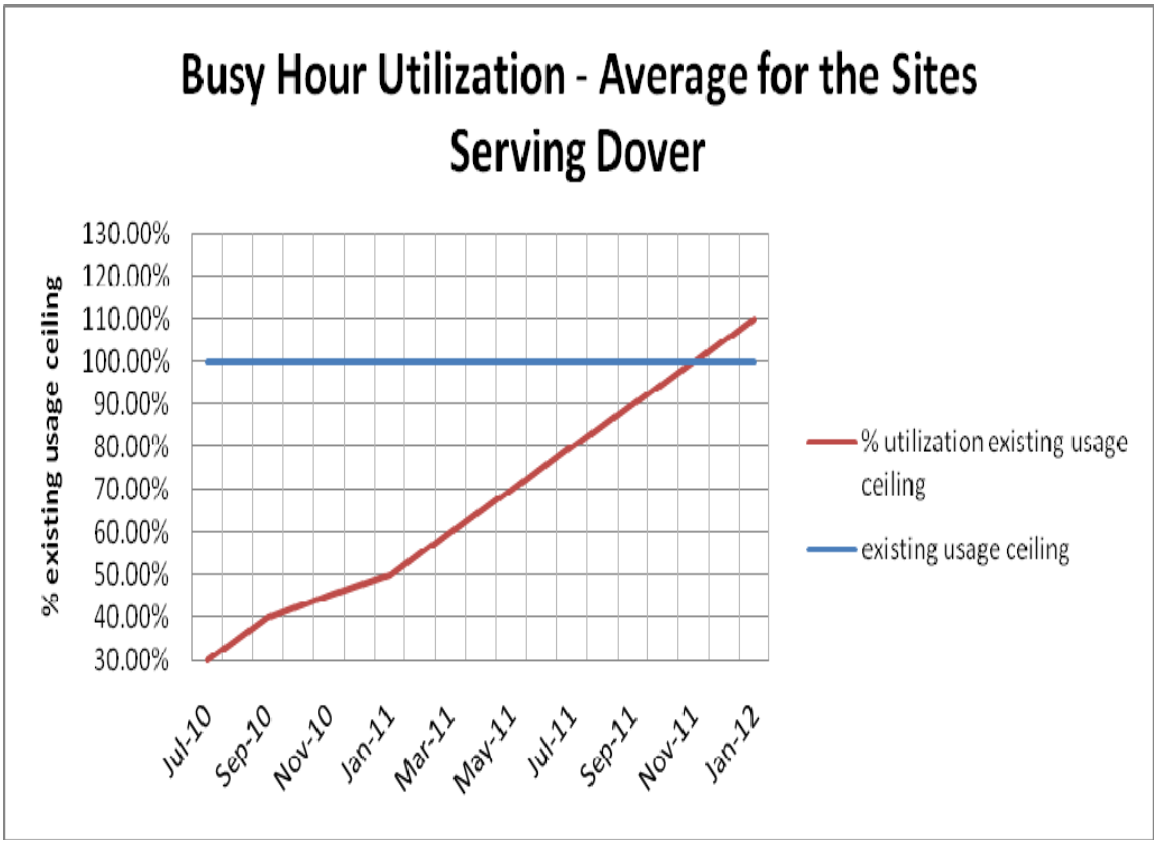
Sincerely,



Andrew M. Petersohn, P.E.
Registered Professional Engineer
Delaware license number 14438

Network Capacity in Dover

The Verizon Wireless facilities currently serving the Dover area are nearing their data capacity upper-limit "ceiling". Spurred on by smart-phones, data cards, and the various applications and content available, an exponential growth in data use over the past few years has left providers, equipment manufacturers, and the FCC looking for solutions and radio spectrum to address the demand. Because Verizon Wireless can only broadcast and receive in the bands for which they are licensed, there is a finite amount of data throughput that can be supported even using the most modern equipment offered by base-station manufacturers. Illustrated below, actual data usage coupled with a conservative county-based future data use trend indicates that if left unaddressed the capacity demand on the existing facilities serving the Dover area will overrun the available resources before the end of 2011. During NASCAR race weekends and other events that create an influx of traffic the wireless data demand is already outstripping available network capacity.



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Existing Verizon Wireless Service

Verizon has six (6) existing sites in the areas targeted for capacity enhancement. These sites will be the first tier of neighbors of the proposed facility:

Cell Number	Name	Structure Type	Antenna Centerline Ht (ft)	Street Address
11	DOVER DOWNS	Monopole	110	0 Bacon Avenue
25	WEST DOVER	Tank	126	1260 West North Road
26	FOX HALL	Tank	115	1293 Walker Road
213	NORTH DOVER	Self-support Structure	188	2030 N. DuPont Hwy
214	DOVER RACE	Self-support Structure	98	1407 North DuPont Hwy
215	SOUTH DOVER	Tank	118	391 United Way

Proposed Verizon Wireless Capacity Upgrade

Illustrated in Figure 1 below, the proposed facility with a 70' antenna centerline will provide consistent signal dominance to a significant portion of geography in the areas targeted for capacity offload. Any decrease in the height of the proposed antenna will decrease the dominance area and diminish the effectiveness of the proposed facility and be a detriment the overall network capacity. A failure to address the pending capacity shortage will undoubtedly result in excessive data service outages and interruptions for Verizon Wireless customers in Dover including those that will impact public safety.

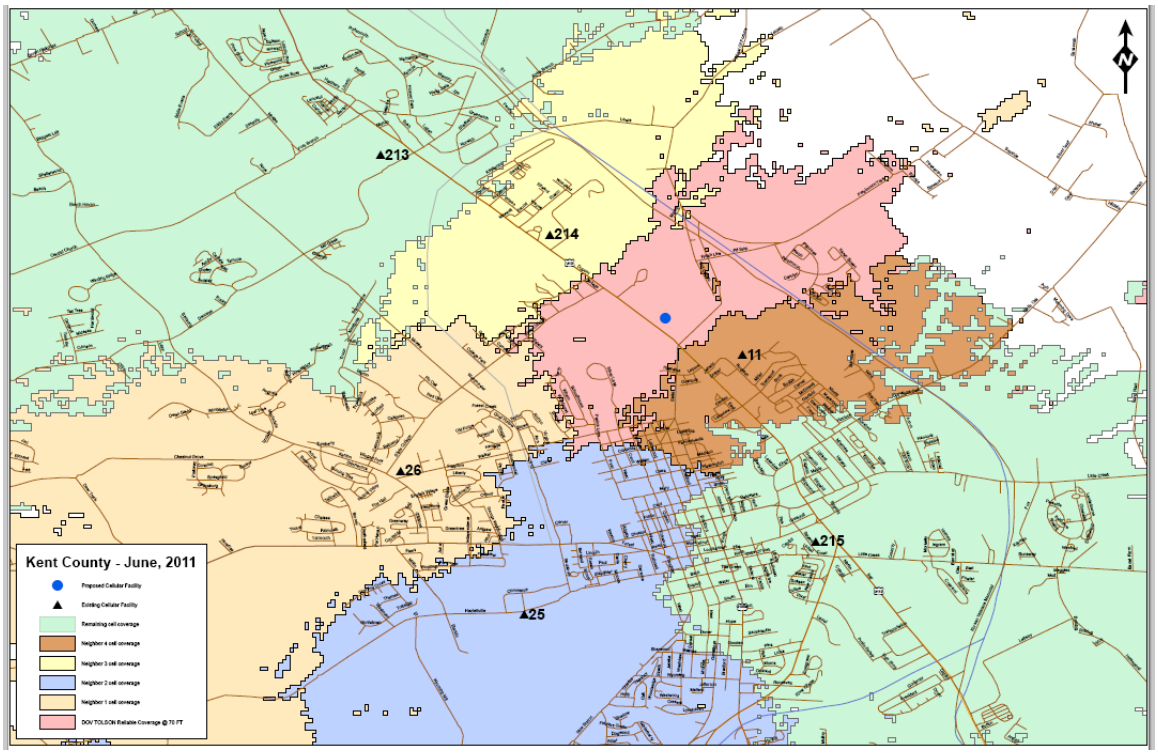


Figure 1 – Proposed Capacity Offload

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As illustrated in Figure 2 below, constructing the site at the maximum overall height of 45' will significantly decrease the dominance and consistency of its coverage footprint relative to the proposed antenna centerline of 70'. This height decrease would substantially diminish the facility's ability to offload the existing sites and contribute meaningfully to the overall network capacity in the area. With most of the surrounding sites' antenna centerlines in the 100'+ range, a new facility must be as close as possible to that range in order to "compete" with its neighbors for mobile subscribers. A facility with an approximate 40' centerline could only be dominant to the subscribers in its immediate surroundings as the facility's line of site to potential subscribers would be interrupted by nearly any clutter feature surrounding the site including buildings, trees, overpasses, etc... At 70', the proposed antenna height will significantly eclipse the prevailing clutter height and allow for significantly better sight lines to potential subscribers.

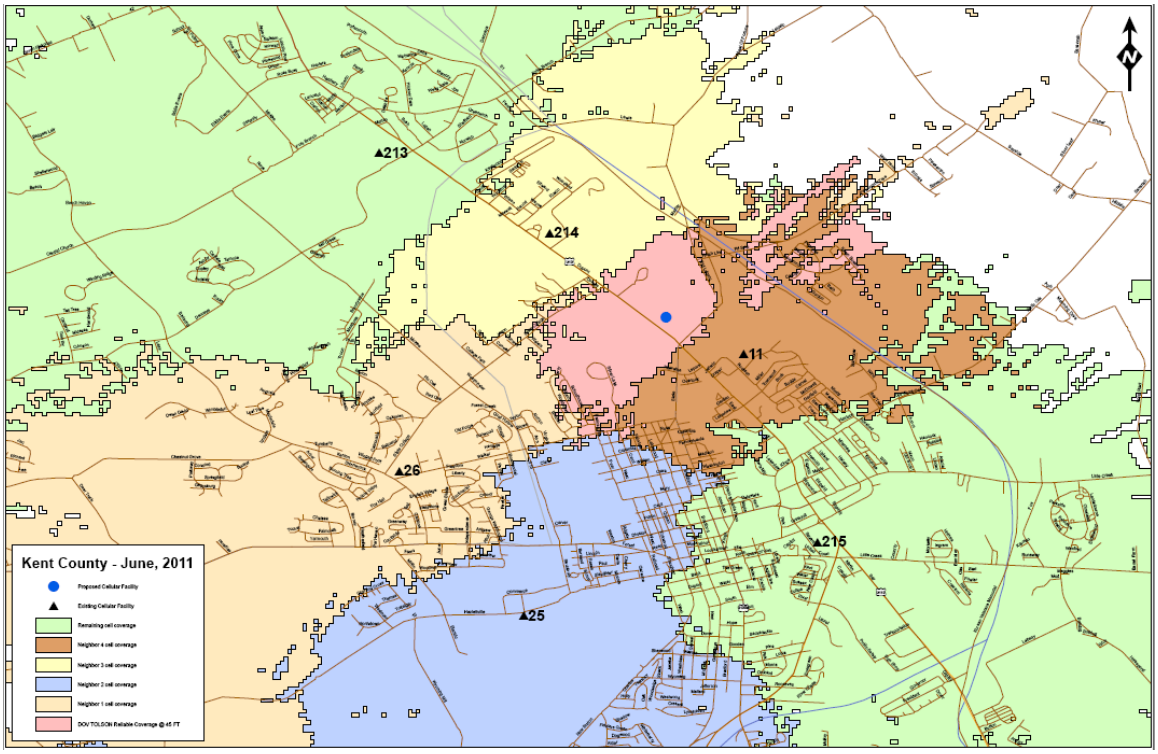


Figure 2 –Capacity Offload with 40' Antenna Centerline

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Reliable Service

The term "reliable" is used to describe areas where a Verizon Wireless subscriber has the ability to place, receive, and maintain a phone call. Additionally, the concept of reliable service extends beyond just voice communication; access to the data network with a high probability of success and adequate throughput is now a component of reliable service. Without adequate capacity, there cannot be reliable service as users attempting to access the network through an overburdened facility will be rejected until such time that resources become available. If the network is not dimensioned properly, delays in network availability are as detrimental as coverage gaps as both will result in a denial of service to the customer. Reliable service provided from a facility is affected by many factors including surrounding topography, clutter types, foliage, and subscriber loading. Because the network must maintain reliability under all conditions, these factors are taken into consideration when designing a facility upgrade.

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Emergency Services Implications

Wireless devices are widely used by municipal emergency services for voice and data services including those that impact public safety. Additionally enhanced 911 (E911) services, which allow a mobile caller to be located by the dispatch center, are dependent on an adequate service level to provide help in an emergency.

Technical Parameters of Consideration

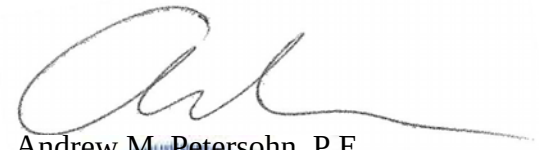
The above calculations were based on the equipment configuration information furnished by representatives of Verizon Wireless. Specifically for this installation, Verizon Wireless plans to install panel style antennas arranged in three sectors with azimuths evenly spaced in the horizontal plane with respect to true north. The antenna centerline height above ground level is planned at 70'. Transmitting through these antennas will be up to four (4) CDMA radios in the 850 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio, up to four (4) CDMA radios in the 1900 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio and one (1) LTE radio in the 700 MHz band (per sector) at a maximum of 100 watts ERP (effective radiated power) per radio.

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Mr. Petersohn also asserts that the calculations and/or measurements described in this report were made personally and in a truthful and objective manner. Mr. Petersohn is a Registered Professional Engineer licensed in Pennsylvania, Delaware, Maryland, Virginia, New York and Florida with pending reciprocity in New Jersey. He has over a decade of engineering experience in the field of wireless communications. Mr. Petersohn is an active member of the National Society of Professional Engineers (NSPE) and the Institute of Electronic and Electrical Engineers (IEEE). Mr. Petersohn further states that all facts and statements contained in the foregoing document are true and accurate to the best of his knowledge. He believes, under penalty of perjury, the foregoing to be correct.



Andrew M. Petersohn, P.E.
Registered Professional Engineer
Delaware license number 14438



Executed this the 30th day of June, 2011.

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AREA VARIANCE CRITERIA LIST

1. **The nature of the zone in which the Property lies.** The subject property lies with the C4 ("Highway Commercial") zone. This zone permits a wide variety of significant commercial uses including, but not limited to, drive-in facilities, motels and restaurants, outdoor recreational facilities, theatres, and household moving and other storage operations. Commercial telecommunications towers are permitted in the C4 zone subject (unless a variance is needed) only to administrative site plan approval, thus the proposed installation is consistent with the nature of the zone.

2. **The character of the immediate vicinity and the uses contained therein.** The subject property is located on Route 13 in the middle of an expansive, 6-lane stretch of commercial properties. The subject property contains J.D. Shuckers Restaurant, as well as a small, 40-45 foot tall cellular monopole, and is bordered by Delaware State University to the west, strip shopping centers to the north, Home Depot, Dover Downs and the race track to the east, and additional commercial business to the south. A number of these sites contain tall structures such as signs, stadiums, light poles, bleachers for Dover Downs as well the hotel itself such that a 75 foot tall monopole would not be out of character with what surrounds the property in this highly commercial area.

3. **Whether, if the restriction upon the applicant's property is removed, such removal would seriously affect neighboring properties and uses.** The applicant believes that the granting of this application would have no adverse impact on surrounding properties or uses. As the Board is likely aware, these installations take up minimal space. In this instance, the proposed installation is located at the rear of a developed commercial site with a background of taller structures behind it. As the attached photographs show, the area is decidedly commercial, with a number of buildings, light poles, signs and other structures in the area. The addition of a single, 70' monopole, roughly 3 feet in diameter (with a six foot lightening rod at the top) will not be out of character with the area nor will it detract from the uses that currently are located in this area. In addition, this installation will serve to improve the quality of Verizon Wireless's coverage in this area by assisting in resolving current capacity shortfalls that exist in this heavily travelled area of Dover.

4. **Whether, if the restriction is not removed, the restriction would create unnecessary hardship or exceptional practical difficulty for the owner in his ability to make normal improvements to his property or permitted uses.** The application is being pursued due to existing capacity concerns within Verizon Wireless's network. Previously, these concerns only manifested themselves during the race weekends at Dover Downs and they could be addressed through the use of temporary facilities. These usage concerns, which result not only from cell phone calls but the increased use of text messaging, email and downloading capabilities provided by and expected from today's smartphones, have now risen to the extent that they are no longer just present on race weekends and can no longer be corrected through the use of temporary facilities. The radio frequency spectrum licensed to Verizon Wireless by the FCC is exhausted.

To handle these issues, new sites are necessary to provide additional capacity for new and existing customers. Verizon Wireless has investigated whether the tower could work at 45 feet and determined that it simply will not provide the necessary offloading at any height less than 70 feet. If forced to maintain 45 feet in height, the required coverage footprint for offloading could not be met and the facility could not serve its intended purpose. Indeed, most of the Verizon Wireless locations in the area are established at 100 feet or higher.



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V-11-06




LIQUORS
NO PARKING
NO PA









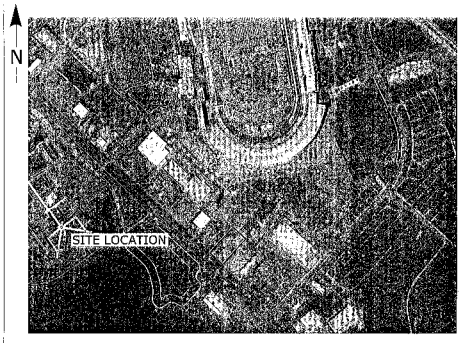
CELLCO PARTNERSHIP

d/b/a verizon wireless

WIRELESS COMMUNICATION FACILITY

DOV TOLSON
889 DUPONT HIGHWAY
DOVER, DE 19901

KEY LOCATION MAP



KEY LOCATION MAP

SCALE: 1"=500'

500' 250' 0 500' 1000'

CITY APPROVAL

APPROVED THIS. _____DAY OF_____ 20_____

_____
CHAIRMAN

_____
SECRETARY

_____
CITY ENGINEER

LIST OF DRAWINGS

T-1 KEY LOCATION PLAN & PROJECT DATA
T-2 TAX/ZONING MAP & 200' PROPERTY OWNERS LIST
SP-1 SITE PLANS & ELEVATION
C-1 EQUIPMENT SHELTER CONSTRUCTION DETAILS
C-2 CONSTRUCTION DETAILS

GENERAL NOTES

1. THE PROPOSED FACILITY IS UNMANNED, OCCUPANCY IS LIMITED TO PERIODIC VISITS BY VERIZON PERSONNEL FOR ROUTINE MAINTENANCE AND INSPECTION APPROXIMATELY ONCE OR TWICE A MONTH. THEREFORE NO NEW PARKING IS PROPOSED.
2. POTABLE WATER AND SANITARY SEWER SERVICES ARE NOT REQUIRED OR PROPOSED FOR THE NEW FACILITY.
3. ONE BUILDING MOUNTED LIGHT IS PROPOSED.

BULK REQUIREMENTS

MAP NO. 2-05-05700-01-3800-000

ZONE: C4 HIGHWAY COMMERCIAL

MINIMUM LOT	REQUIRED	EXISTING	PROPOSED
SIZE (SF)	N/A	80,000	NC
WIDTH (FT)	300	200	NC
DEPTH (FT)	150	400	NC
BUILDING SETBACKS			
FRONT (FT)	30	55.4	NC
ONE SIDE (FT)	25	25.6	NC
REAR (FT)	10' OR EQUAL TO BLD. HEIGHT (20')	178.7	37.9
MAXIMUM HEIGHT/ STORIES	45/4	20/2	76Ⓥ①
LOT COVERAGE (SF)	N/A	54,748	55,162
LOT COVERAGE (%)	N/A	68	69
FREESTANDING TELECOMMUNICATIONS TOWERS			
EQUIPMENT SHELTER			
GROSS AREA (SF)	NA	250±	345±
HEIGHT (FT)	NA	10.75	NC
REAR SETBACK	NA	56.6	37.9
SIDE SETBACK	NA	26.1	NC
TOWER SETBACKS			
REAR	NA	48.1	NC
SIDE	NA	30.9	NC
FRONT	NA	349.5	325
HEIGHT	NA	45	76 ①

Ⓥ VARIANCE REQUIRED
① TO TOP OF LIGHTING ROD

PROJECT DATA

PROJECT:	DOV TOLSON
LOCATION:	889 DUPONT HIGHWAY DOVER, DE 19901
MAP NO.	2-05-05700-01-3800-000
ZONING:	C4 HIGHWAY COMMERCIAL
TOTAL LOT AREA:	80,000 SF 1.8368 AC
PROPERTY OWNER:	PIP ENTERPRISES, LLC
POWER PROVIDER:	DOVER ELECTRIC UTILITY (302) 736-6700
GAS PROVIDER:	CHESAPEAKE UTILITIES (302)-734-6700
TELCO PROVIDER:	VERIZON
APPLICANT:	CELLCO PARTNERSHIP d/b/a VERIZON WIRELESS 5175 CAMPUS DRIVE PLYMOUTH MEETING, PA 19462

SITE DATA

LATITUDE = N 39° 11' 02.1"
LONGITUDE = W 75° 31' 52.2"
DATUM NAD 83

USGS ELEVATION DATA
GROUND ELEV. = 31.5' AMSL
DATUM NAVD 88

TRUE NORTH DETERMINATION, GROUND (AMSL) ELEVATION, LATITUDE AND LONGITUDE COORDINATES ARE BASED ON USGS MAP INFORMATION

SCHEDULE OF REVISIONS

REV. NO.	DATE	DESCRIPTION OF CHANGES	BY	CK. BY
B	4/20/11	REVISED PER COMMENTS AT D.E. ENGINEERING REVIEW MEETING	MH	DS
A	4/12/11	ISSUED FOR PRELIMINARY REVIEW	JAM	JV

CELLCO PARTNERSHIP
d/b/a verizon wireless
5175 CAMPUS DRIVE
PLYMOUTH MEETING, PA 19462

D.E. ENGINEERING CERTIFICATE OF AUTHORIZATION No. 2666

E 2 PROJECT MANAGEMENT LLC
87 FIBERGLASS AVENUE
ROCKAWAY, N.J. 07866
PHONE: (973) 309-0300
FAX: (973) 285-9999
www.E2PM.com

E2PM

I CERTIFY THAT THESE PLANS HAVE BEEN PREPARED UNDER MY SUPERVISION

JOHN DAVID PERMATTEI, P.E. D.E. No. 13589
LICENSED PROFESSIONAL ENGINEER

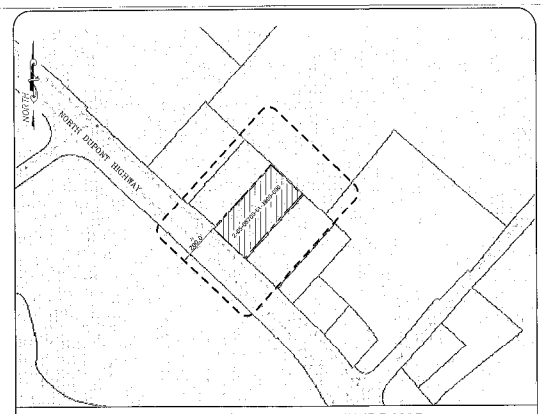
KEY LOCATION PLAN & PROJECT DATA

PROJECT:
DOV TOLSON
889 DUPONT HIGHWAY
DOVER, DE 19901

DRAWING IS ISSUED STATUS CURRENTLY -
A-ISSUED FOR PRELIMINARY REVIEW
B-CONSTRUCTION
C-(SPECIFY)
B

FIRST ISSUED: 4/12/10
DRAWN BY: JAM
CHECKED BY: JCP
SCALE: AS SHOWN
PROJECT #: P-

DRAWING NO.
T-1
SHEET NO: 1 OF 5
PRINT DATE: 4/20/11

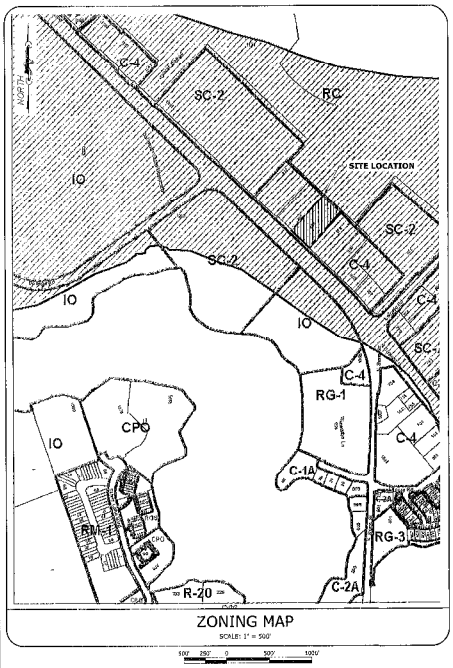


TAX AND 200' PROPERTY OWNERS MAP

SCALE: 1" = 200'

200' 100' 0 200' 400'

200' PROPERTY OWNERS LIST



ZONING MAP

SCALE: 1" = 500'

500' 250' 0 500' 1000'

Zoning
A Agriculture
C-1 Neighborhood Commercial
C-1A Limited Commercial
C-2 Central Commercial
C-2A Limited Central Commercial
C-3 Service Commercial
C-4 Highway Commercial
CPO Commercial Professional Office
SC-1 Neighborhood Shopping Center
SC-2 Community Shopping Center
SC-3 Regional Shopping Center
RC Recreational and Commercial
IO Institutional and Office
M Manufacturing
IPM Industrial Park Manufacturing
IPM-2 Industrial Park Manufacturing- Technology Center
R-7 One Family Residence
R-8 One Family Residence
R-10 One Family Residence
R-15 One Family Residence
R-20 One Family Residence
RG-1 General Residence
RG-2 General Residence
RG-3 Group Housing
RG-4 Multistory Apartments
RG-5 Mid Rise Apartments
RGO General Residence and Office
RM-1 Medium Density Residence
RM-2 Medium Density Residence
ROS Recreational and Open Space
MPH Mobile Home Park
TND Traditional Neighborhood Design
COZ-1 Corridor Overlay Zone
H Historic District
Airport Environs Overlay Zone (AEOZ)
65 Noise Zone A
70 Noise Zone B
75 Noise Zone C
80 Noise Zone D
CZ Crash Zone
APZ I and APZ II Accident Potential Zones I & II

ZONING LEGEND

SCHEDULE OF REVISIONS

NO	DATE	DESCRIPTION OF CHANGES	BY	CK BY
B	4/25/11	REVISED PER COMMENTS AND ISSUED FOR MUNICIPAL REVIEW/APPROVALS	JAM	JS
A	4/12/11	ISSUED FOR PRELIMINARY REVIEW	JAM	JS

CELLCO PARTNERSHIP
c/b/a **verizon** wireless
5175 CAMPUS DRIVE
PLYMOUTH MEETING, PA 19462

D.E. ENGINEERING CERTIFICATE OF AUTHORIZATION No. 2656

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www.E2PM.com

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I CERTIFY THAT THESE PLANS HAVE BEEN PREPARED UNDER MY SUPERVISION

JOHN (LAUCIO) RESANTE, P.E. D.E. No. 19869
LICENSED PROFESSIONAL ENGINEER

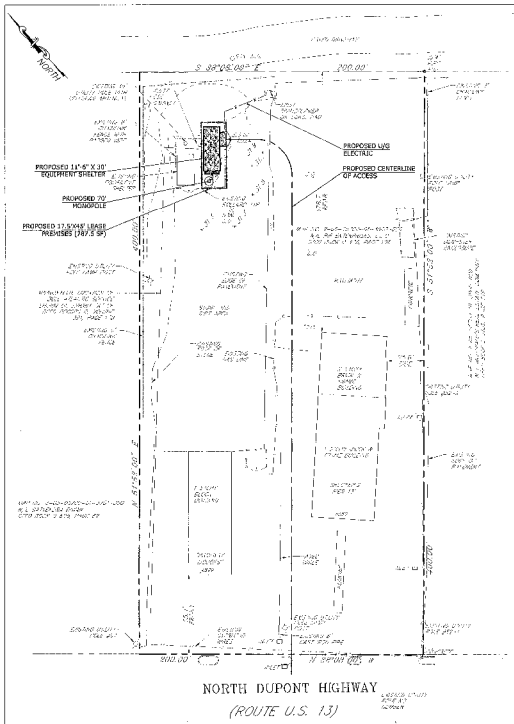
TAX/ZONING MAP & 200' PROPERTY OWNERS LIST

DRAWING ISSUE STATUS CURRENTLY - B

PROJECT:
DOV TOLSON
889 DUPONT HIGHWAY
DOVER, DE 19901

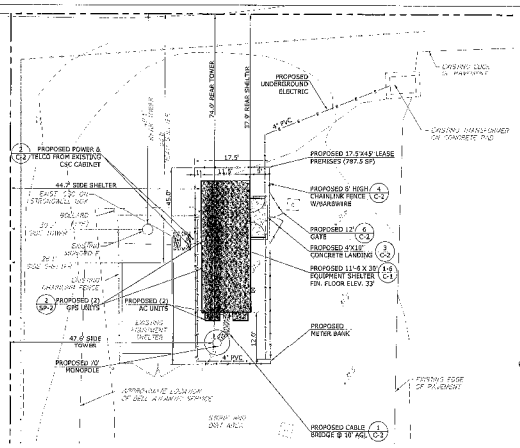
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DRAWN BY: JAM	
CHECKED BY: JCP	
SCALE: AS SHOWN	SHEET NO: 2 OF 5
PROJECT #:	PRINT DATE: 4/26/11

FILE: C:\Projects\Verizon\Dover\Dover Tolson\Dover Tolson Rev B



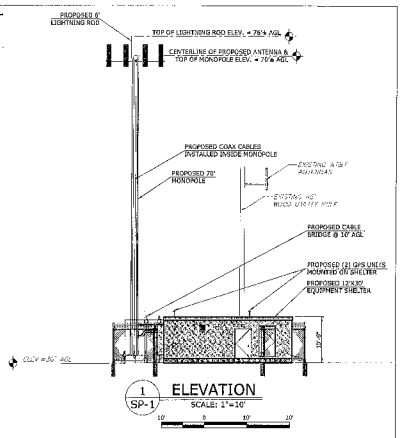
OVERALL SITE PLAN

SCALE: 1"=30'



ENLARGED SITE PLAN

SCALE: 1" = 10'



1 / SP-1 ELEVATION

SCALE: 1"=10'

LEGEND

- PROPERTY LINE
- EASEMENT LINE
- SETBACK LINE
- EXISTING CONTOUR LINE
- EXISTING FENCE
- T — T — PROPOSED UNDERGROUND TELEPHONE CONDUIT
- E — E — PROPOSED UNDERGROUND ELECTRIC CONDUIT

MAP SURVEY REFERENCE:

EXISTING CONDITIONS SHOWN HEREON ARE BASED ON A SURVEY ENTITLED "PLAN OF SURVEY 809 & 889 NORTH DUPONT HIGHWAY MAP NO. 3-ES-05705-01-3800-000 SITUATED IN CITY OF DOVER, KENT COUNTY, DE." PREPARED BY ANDERSON ENGINEERING ASSOCIATES INC. DATED 3/4/11. AND FIELD OBSERVATIONS BY E2 PROJECT MANAGEMENT, LLC, ROCKAWAY, NJ 07866

SCHEDULE OF REVISIONS

NO.	DATE	DESCRIPTION OF CHANGES	DRAWN BY	CHK'D BY
B	6/20/11	REVISED PER COMMENTS AND ISSUED FOR MUNICIPAL REVIEW/APPROVALS	JMH	TG
A	4/18/11	ISSUED FOR PRELIMINARY REVIEW	JMH	TG

CELLCO PARTNERSHIP
d/b/a verizon wireless
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PLYMOUTH MEETING, PA 19462

D.E. ENGINEERING CERTIFICATE OF AUTHORIZATION No. 2666

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FAX: (973) 309-3059
www.E2PM.com

I CERTIFY THAT THESE PLANS HAVE BEEN PREPARED UNDER MY SUPERVISION

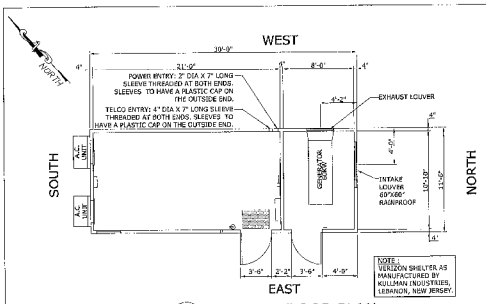
JOHN CLAUDIO TERRANTE, P.E. (N.J. No. 21089)
LICENSED PROFESSIONAL ENGINEER

SITE PLANS & ELEVATION

DRAWING ISSUE STATUS CURRENTLY - B
A-ISSUED FOR ONLINE MAP REVIEW
B-ISSUED FOR ____
C-ISSUED FOR ____
D-ISSUED FOR ____

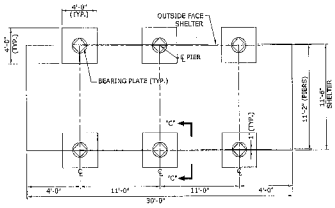
PROJECT:
DOV TOLSON
889 DUPONT HIGHWAY
DOVER, DE 19901

FIRST ISSUE: 4/1/2010
DRAWN BY: JMH
CHECKED BY: JCT
SCALE: AS SHOWN
PROJECT #: P-
DRAWING NO. SP-1
SHEET NO: 1 OF 5
PRINT DATE: 6/28/11
FILE NAME: C:\Documents and Settings\jterrante\Desktop\889 Rev B



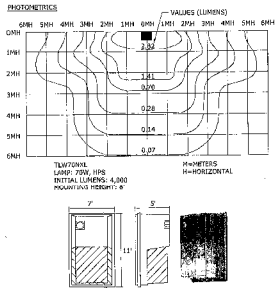
1 C-1 SHELTER FLOOR PLAN

SCALE: 1"=5'



2 C-1 EQUIPMENT SHELTER FOUNDATION PLAN

SCALE: 1"=5'



FOOTCANDLE CORRECTION
DIFFERENT LAMP/WATTS

MULTIPLY THE FOLLOWING FACTORS TIMES THE FOOTCANDLE VALUES FOR CHANGE IN WATTAGE:

35 W HPS	0.40
50 W HPS	0.71
70 W HPS	1.00
50 W MH	0.63
28 W PL	0.29

FOOTCANDLE CORRECTION
MULTIPLY THE FOLLOWING FACTORS TIMES THE FOOTCANDLE VALUES FOR CHANGES IN MOUNTING HEIGHT:

TO CHANGE FROM 8'

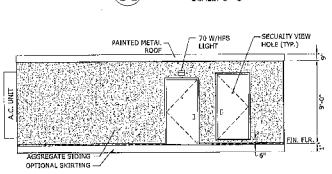
NEW HEIGHT	6'	7'	8'	9'	10'	12'
FACTOR	1.78	1.31	1.00	0.79	0.64	0.44

ALL TLW HIGH PRESSURE SODIUM UNITS ARE SUPPLIED WITH E17 MEDIUMBASE LAMPS. METAL HALIDE FIXTURES COME EQUIPPED WITH E17 MEDIUM BASE LAMPS. COMPACT FLUORESCENT UNITS USE EX32D-3, RATED -20° FAHRENHEIT

NXL START TEMP = -40°
HMA START TEMP = -20°
NF START TEMP = -20°, 26W
32°, 13W

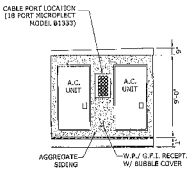
SHELTER MOUNTED LIGHTING DETAILS

SCALE: N.T.S.



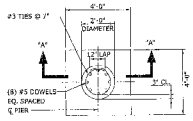
3 C-1 SHELTER EAST ELEVATION

SCALE: 1"=5'

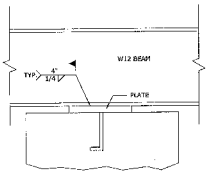


4 C-1 SHELTER SOUTH ELEVATION

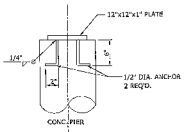
SCALE: 1"=5'

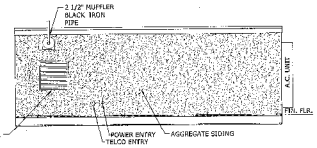


PLAN



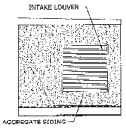
6 C-1 TIE DOWN DETAIL





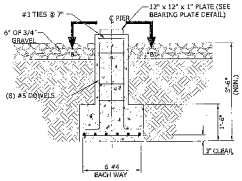
5 C-1 SHELTER WEST ELEVATION

SCALE: 1"=5'

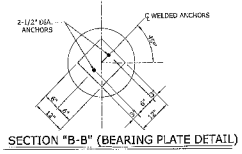


6 C-1 SHELTER NORTH ELEVATION

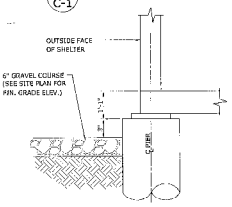
SCALE: 1"=5'



SECTION "A" - "A"



SECTION "B-B" (BEARING PLATE DETAIL)



SECTION "C" - "C"

4 C-1 EQUIPMENT SHELTER FOUNDATION DETAILS

SCALE: N.T.S.

SCHEDULE OF REVISIONS

NO.	DATE	DESCRIPTION OF CHANGES	DRAWN BY	CHK. BY
B	4/26/11	REVISED PER COMMENTS AND ISSUED FOR MUNICIPAL REVIEW/APPROVALS	JAM	JS
A	4/12/11	ISSUED FOR PRELIMINARY REVIEW	JAM	JS

CELLCO PARTNERSHIP
d/b/a verizon wireless
5175 CAMPUS DRIVE
PLYMOUTH MEETING, PA 19462

D.E. ENGINEERING CERTIFICATE OF AUTHORIZATION No. 2666

E 2 PROJECT MANAGEMENT LLC
87 HUDSON ROAD, 4N DRIVE
ROCKAWAY, N.J. 07866
PHONE: (973) 299-0200
FAX: (973) 299-0800
www.E2PM.com

I CERTIFY THAT THESE PLANS HAVE BEEN PREPARED UNDER MY SUPERVISION

JOHN CLAUDIO FERRANTE, P.E., D.E. No. 13689
LICENSED PROFESSIONAL ENGINEER

EQUIPMENT SHELTER CONSTRUCTION DETAILS

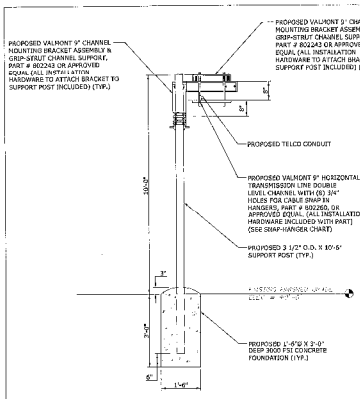
PROJECT:
DOV TOLSON
889 DUPONT HIGHWAY
DOVER, DE 19901

DRAWING ISSUE STATUS CURRENTLY -
A-APPROVED PRELIMINARY REVIEW
B-APPROVED
C-APPROVED
D-APPROVED

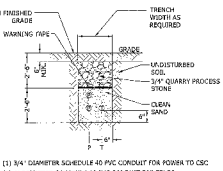
B

FIRST ISSUED: 4/12/10	DRAWING NO. C-1
DRAWN BY: JAM	
CHECKED BY: JCF	
SCALE: AS SHOWN	SHEET NO: 4 OF 5
PROJECT #: n/a	PRINT DATE: 4/26/11

FILE: V:\Projects\Active\GREENWOOD\Revised Submittal Dated 4-26-11\D-1

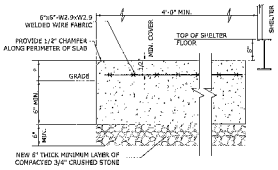


1 C-2 CABLE BRIDGE SUPPORT DETAIL
SCALE: N.T.S.



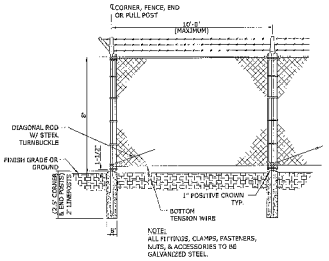
(1) 3/4" DIAMETER SCHEDULE 40 PVC CONDUIT FOR POWER TO CSC
(1) 4" DIAMETER SCHEDULE 40 PVC CONDUIT FOR TELCO
(1) 4" DIAMETER SCHEDULE 40 PVC CONDUIT FOR POWER FROM TRANSFORMER TO METER BANK
(1) 4" DIAMETER SCHEDULE 40 PVC CONDUIT FOR POWER FROM METER BANK TO SHELTER

2 C-2 TRENCH DETAIL
SCALE: N.T.S.



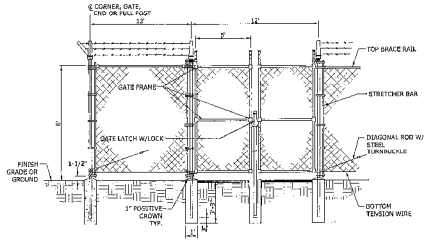
* 8" MAX., IF GREATER THAN 8" PROVIDE A SECOND STEP.

3 C-2 DOOR PAD DETAIL
SCALE: N.T.S.



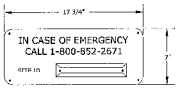
NOTE:
ALL FITTINGS, CLAMPS, FASTENERS, NUTS, & ACCESSORIES TO BE GALVANIZED STEEL

4 C-2 CHAIN LINK AND BARBWIRE FENCE DETAIL
SCALE: N.T.S.



6 C-2 GATE DETAIL
SCALE: N.T.S.





NOTES
1) SIGN SHALL BE MOUNTED ON EX ISEROR SIDE OF GATE LEADING INTO COMPOUND.
2) MOUNTING HEIGHT TO BE 5'-0" ABOVE GRADE TO CENTERLINE OF SIGN.

NOTES
1) SIGN SHALL BE MOUNTED ON EXTERIOR SIDE OF SHELTER DOOR.
2) MOUNTING HEIGHT TO BE 5'-0" ABOVE SILL TO CENTERLINE OF SIGN.

5 C-2 SIGN DETAILS
SCALE: N.T.S.

TYPICAL WOVEN WIRE FENCING NOTES:

(INSTALL FENCING PER ASTM F-567, SWING GATES PER ASTM F-900)

1. GATE POST, CORNER, TERMINAL OR PULL POST 2 1/2" DIA. PIPE FOR GATE WIDTHS UP THRU 6' OR 12' FOR DOUBLE SWING GATE PER ASTM-F1083
2. LINE POST: 2" DIA. PIPE PER ASTM F1083
3. GATE FRAME: 1 1/2" DIA. PIPE PER ASTM F1083
4. TOP RAIL AND BRACE RAIL: 1 1/2" DIA. PIPE PER ASTM F1083
5. FABRIC: 12 GA. CORE WIRE SIZE 2" MESH, CONFORMING TO ASTM A392
6. TIE WIRES: MIN. 11 GA. GALVANIZED STEEL AT POSTS AND RAILS. A SINGLE WRAP OF FABRIC TIE AND AT TENSION WIRE BY HOG RINGS SPACED MAX. 24" INTERVALS.
7. TENSION WIRE: 7 GA. GALVANIZED STEEL.
8. GATE LATCH: 1 3/8" O.D. PLUNGER ROD WITH MUSHROOM TYPE CATCH AND LOCK, KEYED ALIKE FOR ALL SITES IN N GIVEN MTA.

SCHEDULE OF REVISIONS

REV. NO.	DATE	DESCRIPTION OF CHANGES	DRAWN BY	CHK. BY
6	4/25/11	REVISED PER COMMENTS AND ISSUED FOR MUNICIPAL ISSUE/APPROVALS	JKM	JS
A	4/12/11	ISSUED FOR 2ND INTERNAL REVIEW	JKM	JS

CELLCO PARTNERSHIP
d/b/a verizon wireless
5175 CAMPUS DRIVE
PLYMOUTH MEETING, PA 19462

D.E. ENGINEERING CERTIFICATE OF AUTHORIZATION No. 2666

E 2 PROJECT MANAGEMENT LLC
97 HENDRICKS AVENUE
ROCKAWAY, NJ. 07866
PHONE: (973) 299-6250
FAX: (973) 299-9899
www.E2PM.com

I CERTIFY THAT THESE PLANS HAVE BEEN PREPARED UNDER MY SUPERVISION

JOHN CLAUDIO PERRANTE, P.E. D.E. REG. 12889
LICENSED PROFESSIONAL ENGINEER

CONSTRUCTION DETAILS

PROJECT:
DOV TOLSON
849 DUPONT HIGHWAY
DOVER, DE 19901

DRAWING ISSUE STATUS CURRENTLY -
A-ISSUED FOR FIELD OR FACTORY REVIEW
B-(SPECIFY)
C-(SPECIFY)
D-(SPECIFY)

B

PRINT ISSUE: 4/12/10	DRAWING NO.
DRAWN BY: JKM	C-2
CHECKED BY: JCP	
SCALE: AS SHOWN	SHEET NO: 8 OF 8
PROJECT #: P-	PRINT DATE: 4/26/11
FILE:	