

The Martha's Vineyard Commission

Dear Commissioners,

As you may, or may not know, I have been approached by numerous residents of the Enos Lots and surrounding neighborhoods as well as other citizens of Edgartown who feel that Sampson Ave is the wrong place on Chappy to site a tower. Among this group are members of the police and fire departments, other town employees and contractors that have stated to me that they do not think Sampson Ave is the right place for a tower, but that they fear for their jobs, their livelihood and the future of their families.

I would like you to consider that for a moment. Members of this community, fearful to express their true feelings and opinions for fear of retribution? What does that say about this community when meaningful public discourse is stifled and stymied by fear of retribution; by the fear that these people won't be able to feed their families? It is shameful, and has only compounded the outrage I feel over a decision that seems a foregone conclusion without any true meaningful discourse.

I am writing you today to clarify the position of the opposition group I represent and to voice our rebuttal to statements made and testimony given.

We have all heard from people in favor of a tower on Sampson Ave, but, quite frankly not one has provided any sound reason for their support other than "I want, or need, cell service." From residents of the neighborhood being supportive of another neighbor, to the police and fire chiefs, "We need, want, like service," is not a sound reason to site a tower on Sampson Ave.

What I, and members of my group, are saying is that there are many other locations where a tower could be sited, and we provide pages and pages of data supporting that position.

Placing a cell tower, in another area of Chappy will not deny these people the service they want, or need, or simply like having, it simply puts a tower in a more appropriate place, a place we would maintain, provides better coverage to a larger area and more people, and therefore provides better public safety for everyone on Chappy.

We have heard testimony that the Town of Edgartown has been trying to determine how to improve cell service on Chappy for many years. We have heard about the various cell committees and technological approaches. We have heard testimony that the various committees have, for seven years, been trying to solve the issue of cell service on Chappy. If that is true, then the math breaks down this way:

7 years = 2,555 days

The first public mention of a Sampson Ave tower took place on March 15, 2016
The final approval for the temporary tower on Chappy was given April 19, 2016

March 15 - April 19 = 35 days

$2,555 \div 35 = 1.368$

Less than 1.4% of ALL the time devoted to this issue was devoted to Sampson Ave!

When my neighbors and I say this site has NEVER been properly vetted, we are looking at a 35-day process, *one-point-three percent* of all the time devoted to this site. We find that highly

objectionable, and we find it highly disingenuous when one claims to have been an active participant in this process claiming that the decision to site a tower on Sampson Ave has not been “precipitous.” It has been the very definition of precipitous!

Personally, I find it offensive when one individual stands up and makes such claims, knowing full well, that this tower is as far from his home and his property as it could be and therefore minimizes the impacts upon him personally, while also owning a 3.8 acre parcel of undeveloped land AT&T has not only surveyed, but on which AT&T has also conducted an RF analysis, and determined to be viable, and yet this individual, in spite of his most vocal support of a Sampson Ave tower, has refused to make his land available for the tower. In a location in the woods, and away from people’s homes.

With all due respect, if one feels so adamant about the need for a tower, owns suitable property, yet refuses to make that land available while simultaneously advocating for a site that does the most harm, impacts the largest numbers of people and fails to meet the standards of improved public safety for all, that individual’s judgement, or motivations, must be called into question.

Further, when one claims to have been so actively involved in this process, yet still has not explored any of the possible options that exist, one must call into question that individual’s knowledge and understanding of the issues, and the implications such a project represents on such a small rural island like Chappaquiddick.

The fact is, no truly creative, proven, approaches have been explored.

- For example, there is the “Universal Services Fund” a federal program, overseen by the FCC that collects money from every phone bill, wired and wireless, in the form of the “Universal Access Fee” charge that appears on your phone bills.
- The Universal Services Fund is broken down into four specific programs:
 - A fund to wire schools and libraries to the Internet
 - A fund to provide low-cost cellular phones to the poor and elderly (Lifeline)
 - A fund for telemedicine in rural areas
 - Connect America Fund, which is designed specifically to fund cellular services in rural or underserved communities.

We believe Chappy would qualify for funds under the Connect America Fund, and I have spoken with the FCC to understand that process. Only the municipality can apply for that money, and to date, Edgartown has never sought funding under that program, into which, we all pay.

Additionally, AT&T has received over \$427 Million Dollars in Connect America Funds in 2016 alone! Making AT&T the second largest recipient of Connect America Funds in the country. Our money, earmarked to build out cellular services in a community like Chappaquiddick.

Other options, like the Town of Edgartown paying for the build-out of a Distributed Antenna System (DAS) on Chappy (the cellular solution overwhelmingly preferred by the residents of Chappaquiddick), then offering low-cost rent to carriers, with the agreement that the carriers maintain the system. Similar to approaches taken in Chilmark and Aquinah. Creative funding, such as the sale of the “Yellow House” on Main St, and allocating profits from that sale to a Distributed Antenna System, which, with ubiquitous fiber-optic cabling now in place on the primary roads of Chappy, overcomes the single biggest technical challenge to DAS on Chappy.

An honest, independent, objective look at alternative sites on Chappy for a tower, or multiple smaller, less intrusive towers.

We feel it is important for the Commission to have a full and complete understanding of not only all of the shortfalls and limitations to the proposed tower on Sampson Ave, it must also have a factual and accurate counter-point to the very few arguments that can be made for a tower on Sampson Ave.

Because we cannot challenge the assertions of those in support via cross-examination, or public rebuttal, our only alternative, is to lay out the true facts, and to provide you, the Commissioners, with our rebuttal to these few tepid statements of support for this proposal.

The fact is, wanting service, and wanting that service provided from a site on Sampson Ave indicates only a few things:

- the individual is motivated by a sense of obligation to a neighbor; admirable, but insufficient reasoning;
- The individual does not fully understand the limitations, liabilities, hazards and other shortcomings, and is therefore insufficiently informed to have a meaningful opinion;
- The individual is motivated by some external factor such as a sense of self-preservation, which minimizes some perceived impact to that one individual (fear), which by its own definition is self-serving, and therefore not equitable;
- or, the individual is motivated by some benefit derived personally in the form of remuneration or some other tangible personal benefit, and is therefore driven by greed and duplicity.

What one sees in the letters in support of a tower are really only two basic statements, a desire for service, without specifying any particular location, or statements in support of a Sampson Ave location that fall into one of those four categories.

With all due respect, those letters, in support of a Sampson Ave tower, simply do not carry the weight, nor do they provide a shred of justification beyond those four points. I would further argue, that the majority of the letters in support of a Sampson Ave tower, mention nothing about the tower, but instead focus on Mr. Fynbo personally, which again, really has nothing to do with this decision.

Ultimately, the Commission must reject the majority of the letters in support of a Sampson Ave tower for all of the reasons enumerated above, and instead, focus on all of the failures and shortcomings such a development in this small quiet neighborhood implies, and, focus its attention on the problem at hand: providing the best cell coverage to the largest portion of Chappaquiddick.

When viewed under that lens, Sampson Ave quickly becomes not only the least appropriate location on all of Chappy on which to site a tower, it also becomes the one with the largest numbers of problems for the largest segments of the community.

Thank you for your time, and for your most careful, and thoughtful consideration of what a massive cell tower means anywhere, and most especially on Sampson Ave, for the entire community and island of Chappaquiddick.

Respectfully,
Robert Strayton
Chappaquiddick