



June 9, 2025

Supplement to Chamberlin Expert Report Dated June 4, 2025

Re: De Novo Hearing Before the Santa Cruz County Board of Supervisors to Consider Appeal of Application 221049, a Proposed 151.1-Foot Tall Monopine Cell Tower at 186 Summit Drive (Assessor's Parcel Number 080-062002)

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This supplement has two objectives:

1. To provide additional information regarding the measured and modeled coverage area presented in the Brooks report.
2. To provide additional information about available infrastructure in the Bonny Doon area that can be used to provide in-vehicle coverage if it does not currently exist.

Reporting Requirements for Modeled and Measured Data

As stated in my initial report, providers must follow strict guidelines for data submission to ensure accurate comparisons. Although I did not specify these guidelines previously, I now offer the following information that must be provided when submitting modeled coverage-area data (taken from § 1.7004 Scope, Content, and Frequency of Broadband Data Collection Filings, effective September 16, 2024):

1. The name of the radio network planning tool(s) used, along with the following information:
 - The version number of the planning tool.
 - The name of the planning tool's developer.
 - The granularity of the model (e.g., 3-arc-second square points).
 - Affirmation that the coverage model has been validated and calibrated at least once using on-the-ground testing and/or other real-world measurements completed by the provider or its vendor.

The Brooks report does not provide any of the above information when presenting the modeled coverage maps, making it impossible to assess quality or replicate results.

The AT&T reported data made available through the FCC Broadband Map apparently does provide the model information described above and consequently has far more credibility. Furthermore, it is unlawful to report erroneous coverage results to the FCC Broadband Map, which enhances its credibility.

As noted in my initial report, the Brooks report provides no documentation about how the drive tests were performed such as the equipment used, where the antenna was placed, and whether the measurement device was calibrated. Without knowing these details, meaningful comparisons with other measured data cannot be made. This is relevant in Bonny Doon, where community-measured data are in disagreement with AT&T reported data.

Alternative Site to Provide In-Vehicle Mobile Coverage in Purported Gap Areas

If additional infrastructure turns out to be necessary to provide in-vehicle coverage in the Bonny Doon area, although current evidence suggests that it is not, there is an existing 150-foot tower on Patrick Road, just 1,000 feet away from the proposed site as noted in my original report. AT&T dismissed that site based on results from the same undocumented modeling tool addressed above. However, the maps generated by the models for the two sites given in the Brooks report show comparable predicted coverage, and the difference in modeled results appears to be within the 6-8 dB margin of error typical of propagation models. Consequently, it should not be assumed that either site is markedly preferable with regards to providing coverage.