

February 11, 2026

Mayor Lance N. Millman  
and the Board of Trustees  
Village of Montebello  
1 Montebello Road  
Montebello, NY 10901

**Re: Independent RF Engineering Opinion – FCC RF Compliance Assessment**  
Site NY161 – Tallman  
350 Haverstraw Road, Montebello, New York

Dear Mayor Millman and Members of the Board:

I have reviewed the FCC RF Compliance Assessment prepared for the proposed wireless telecommunications facility identified as Site “NY161 – Tallman,” dated June 30, 2025 prepared by the Pinnacle Telecom Group for Homeland Towers. The purpose of my review was to evaluate the methodology, assumptions, and conclusions presented in the report and to provide an independent technical opinion regarding compliance with applicable Federal Communications Commission (FCC) radiofrequency (RF) exposure standards.

### **Expert Qualifications**

I am an RF engineering expert with over thirty-eight (38) years of engineering and executive experience in the wireless communications industry, including RF engineering, network design, system performance, public safety communications, cellular optimization, distributed antenna system (DAS) and small cell design, FCC compliance analysis, and expert testimony in wireless infrastructure matters. I hold a Bachelor of Science degree in Electrical Engineering from the New Jersey Institute of Technology and serve as President of PierCon Solutions LLC, where I provide wireless engineering consulting and RF compliance evaluations for telecommunications facilities throughout the United States.

My industry affiliations include the Institute of Electrical and Electronics Engineers (IEEE), the Association of Public-Safety Communications Officials (APCO), the Safer Buildings Coalition, and regional wireless industry organizations. My experience includes deposition and trial testimony involving RF engineering and wireless infrastructure. I have been accepted as an expert in the field for RF engineering before numerous federal courts.

### **Independent Technical Opinion**

Based upon my education, training, and extensive experience in RF engineering and wireless infrastructure design, and within a reasonable degree of RF engineering certainty, it is my expert opinion that the compliance analysis is generally well-prepared,

follows accepted engineering practices, and applies the methodologies outlined in FCC Office of Engineering and Technology (OET) Bulletin 65 for evaluating human exposure to RF emissions.

The report concludes that the conservatively calculated maximum RF exposure at street level, assuming collocation of multiple wireless carriers, is a small fraction of the FCC general population Maximum Permissible Exposure (MPE) limit and remains well below the regulatory threshold for compliance. Exposure levels of this magnitude are consistent with those typically observed for multi-carrier macrocell installations and demonstrate clear compliance with federal RF safety standards.

### **Engineering Observations**

While the overall conclusion of compliance is technically sound, several items should be clarified to improve transparency and technical rigor:

- The report references Effective Radiated Power (ERP); however, the calculations appear to reflect Equivalent Isotropically Radiated Power (EIRP). This distinction does not materially affect the compliance outcome but should be corrected for accuracy.
- Antenna specifications and power assumptions for certain non-Verizon carriers are not fully identified, which makes independent recreation of the modeled results difficult. Inclusion of these parameters would strengthen the defensibility of the analysis.
- Several carrier power levels appear higher than those commonly assumed in comparable studies. This approach increases calculated exposure and therefore supports a conservative compliance determination.
- The report identifies a Verizon antenna centerline height of approximately 107 feet above ground level (AGL), whereas construction documentation indicates the highest centerline is closer to 97 feet AGL with a tower height near 105 feet AGL. From an RF engineering perspective, for areas accessible to the public, modeling antennas at a higher-than-actual elevation is generally **less conservative**, as greater separation distance typically reduces calculated power density. Modeling at the lower, site-plan antenna heights would represent the more conservative approach for evaluating ground-level exposure. Notwithstanding this discrepancy, the predicted exposure remains only a small fraction of the FCC limit, indicating a substantial margin of compliance.
- The modeling graphics focus on the area where maximum exposure is expected to occur near the facility. A brief explanatory note describing this modeling boundary would improve technical clarity.

### **Recommended Best-Practice Enhancements**

The following items are recommended as best-practice enhancements and do not indicate non-compliance:

- Evaluate elevated terrain or nearby construction areas to confirm no localized increases in exposure at higher ground elevations.

- If publicly accessible trails exist within the study radius, a worst-case evaluation along those paths would provide additional conservatism.
- Include a legend for the elevation diagram to improve interpretability of the exposure contours.

None of these observations suggest that the facility would exceed FCC exposure limits; rather, they represent opportunities to further strengthen an already conservative analysis.

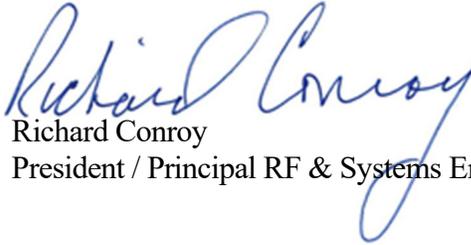
### **Conclusion**

Within a reasonable degree of RF engineering certainty, it is my expert opinion that the proposed wireless installation, as analyzed, will operate in compliance with FCC RF exposure regulations for the general public. The calculated exposure levels are significantly below regulatory thresholds, providing a substantial margin of safety.

Accordingly, from an RF safety perspective, the proposed facility presents no measurable risk to public health and satisfies the applicable federal requirements governing human exposure to radiofrequency energy.

Please feel free to contact me should you require any additional technical review or clarification.

Sincerely,



Richard Conroy  
President / Principal RF & Systems Engineer