DRAFT STAFF REPORT

MADISON COUNTY BOARD OF ZONING APPEALS

November 24, 2026

Petition Number:	**2026-SU-013 and V-041, 042, 043**
Location:	**0 S 200 E, Anderson, IN 46017 48040; SP# 48-13-05-400-002.000-001**
Petitioner:	**APC Towers IV, LLC**
Owner:	**Melissa Robinson (Melissa Merz)**
Request:	**Special use and associated variances for a new 199' cell tower**

2026-SU-013

Special Uses may be approved by the BZA only upon determination that the petition meets all the legal required criteria:

- The approval will not be injurious to the public health, safety, morals, and general welfare of the community.
- The requirements and development standards for the requested special use as prescribed by the Ordinance will be met.
- Granting of the Special Use will not subvert the general purposes served by the Ordinance and will not permanently injure other property or uses in the same district and vicinity.
- The proposed use will be consistent with the character of the zoning district in which it is located and the Madison County Comprehensive Plan.

The Board may examine the following items as they relate to the proposed use:

1. Topography and other natural site features;
2. Zoning of the site and surrounding properties;
3. Driveway locations, street access, and vehicular and pedestrian traffic;
4. Parking amount, location, and design;
5. Landscaping, screening, and buffering;
6. Open space and other site amenities;
7. Noise production and hours of operation;
8. Design, placement, architecture, and building materials of the structure;
9. Placement, design, intensity, height, and shielding of lighting;
10. Traffic generation;
11. General site layout as it relates to its surroundings.

Summary – The attached petition is for a 199' monopole cell tower to go on a parcel just north of 4727 S 200 E. The tower is set back from the road and is located to minimize agriculture disruption. It is also located next to a power line corridor with a 100-foot easement. The tower is 80' from the edge of the easement. The tower is a collapsible monopole type with a 75' fall factor, which puts it outside the power line easement. There is a small cluster of homes about 1,500 feet from the tower location and two homes at about 500 feet from the structure. There are no apparent drainage or floodplain issues. Staff position is favorable pending remonstrance and evidence that may be presented in the public hearing.

LETTER OF INTENT

ClarkQuinn
Clark, Quinn, Moses, Scott & Grahn, LLP

Robert B. Scott
Charles R. Grahn
Frank D. Otte*
John "Bart" Herriman
William W. Gooden**
Russell L. Brown**†
Travis W. Cohron
Michael P. Maxwell
Keith L. Beall
John M. Mead
Jennifer F. Perry
Clark P. Kirkman
Kristin A. McKinney
Olivia A. Hess
Kelly M. Shaw
Laura Taylor

Land Use Consultants
Joseph M. Csikos, AICP

*Also admitted in Montana
†Also admitted in Kentucky
**Registered Civil Mediator

October 23, 2026

Madison County Board of Zoning Appeals
Planning & Development Department
16 East 9th Street
Anderson, IN 46016

RE:		
	Letter of Intent:	Special Exception Application for Wireless Communications Facility
	Property Address:	0 S 200 E, Anderson, IN 46017
	Parcel ID:	48-13-05-400-002.000-001
	Current Zoning:	AG (Agricultural)
	Applicant:	APC Towers IV, LLC & Cellco Partnership d/b/a Verizon Wireless By: Clark, Quinn, Moses, Scott, & Grahn, LLP

1. Executive Summary & Overview

APC Towers IV, LLC and Cellco Partnership d/b/a Verizon Wireless respectfully submit this application for a Special Exception Permit to construct, operate, and maintain a new 199-foot overall wireless communications facility (WCF) on property located at 0 S 200 E, Anderson, IN 46017.

The primary objective of the proposed facility is to eliminate critical wireless coverage gaps, expand high-speed 4G/5G broadband capacity, and support emergency 911 telecommunications services for residents, businesses, and emergency responders in Madison County.

2. Site Location & Facility Description

The subject property is located along South 200 East. The proposed site plan incorporates the following key design elements:

- **Tower Structure**: A 195-foot self-supporting monopole communications tower with a 4-foot lightning arrestor (199-foot overall height), designed to accommodate at least three (3) commercial wireless service providers as well as local emergency communications equipment.
- **Leased Compound Area:** A fenced ground compound measuring approximately 45' x 45', within an overall 100' x 100' leased area designed to house ground equipment cabinets and a back-up power generator.
- **Security & Screening**: A 6-foot tall, 100% opaque, wooden shadowbox fence surrounding the ground compound, situated directly adjacent to an existing mature tree line along the southern property boundary.
- **Access & Utilities**: Access to the compound will be provided via a proposed 12-foot wide, gravel driveway (approx. 631 feet in length) connected to South 200 East. Underground power and fiber connections will run along the designated 30-foot wide access/utility easement.

- **Coverage & Capacity Gap**: Propagation modeling confirms that the immediate surrounding area currently suffers from reduced signal strength, inconsistent in-building coverage, and capacity bottlenecks. The proposed 199-foot height is the minimum height necessary to achieve line-of-sight propagation over surrounding topography and tree canopies.
- **Emergency 911 Services**: Over 80% of emergency 911 calls originate from wireless devices. Enhancing signal coverage in this area directly improves public safety response times and location accuracy for public safety personnel.
- **Colocation Readiness**: To minimize the proliferation of towers in Madison County, the tower structure and compound are specifically engineered for multi-tenant colocation, allowing up to two additional future wireless carriers to co-locate without constructing additional towers.

4. Findings of Fact / Special Use Evaluation

Under Indiana law and Madison County zoning guidelines, the proposed Special Exception meets all applicable criteria for approval:

The proposal will not be injurious to the public health, safety, morals, and general welfare of the community.

- **Finding**: The proposed use will not be detrimental to or endanger the public health, safety, morals, or general welfare of the community.
- **RF Radiation Standards**: The facility will operate in strict compliance with Federal Communications Commission (FCC) radio frequency emissions standards. Radio emissions from the site will remain well below safe federal limits.
- **Structural Safety**: The tower is designed and stamped by an Indiana-licensed Professional Engineer in accordance with ANSI/TIA-222-G structural standards, engineered with a designated breakpoint fall zone of 75-feet from the base of the structure, contained safely within the subject parcel.
- **Unmanned Operation**: The facility generates no dust, noise, glare, toxic emissions, or hazardous waste, and requires no municipal water or sewer connections.

The requirements and development standards for the requested special use as prescribed by the Ordinance will be met.

- **Finding**: The proposal will meet the majority of the development standards prescribed by Section 6.18 of the Zoning Ordinance; however, a total of three variances are being requested concurrently with this application and outlined below. A separate letter of intent, with statutory findings addressed, is provided for the variance requests.
  - **6.18(D)(f)**: Waiver of perimeter evergreen tree landscaping around the compound
  - **6.18(TF-02)(A)**: Side yard setback of 75' 0" (South property line) where 100% of tower height (199' 0") is required
  - **6.18(TF-02)(B)**: Maximum facility height of 199' 0" overall (195' monopole + 4' lightning arrestor) where 125-feet is permitted

Granting the special use will not subvert the general purpose served by the Ordinance and will not permanently injure other property or uses in the same district and vicinity.

- **Finding**: The special use will not be injurious to the use and enjoyment or value of other property in the immediate vicinity.
- The facility is an unmanned, low-impact utility installation that will generate approximately 1 to 2 maintenance visits per month by a single service technician in a standard pickup truck or van. It will create zero daily traffic

hazards, school district burdens, or municipal service draw. The perimeter shadowbox fencing and placement adjacent to an existing electrical transmission corridor ensure minimal visual intrusion into surrounding agricultural land uses.

The proposed use will be consistent with the character of the zoning district in which it is located and the Madison County Comprehensive Plan.

- **Finding**: The proposed use is consistent with the character of the AG district and will not impede or alter the normal and orderly development and improvement of surrounding properties.
- Wireless infrastructure is a necessary support mechanism for both agricultural productivity and potential future commercial or residential growth in Madison County.
- The facility will not occupy prime usable land, occupying only 0.046 acres for the ground compound and remaining unobtrusive to surrounding ongoing agricultural land uses.

5. Utilities, Access, and Drainage

- Adequate utilities, access roads, drainage, and necessary facilities are provided. Electricity and telecommunications lines will be extended underground via a 30-foot wide utility easement connected to municipal power along S 200 E. The gravel drive and ground compound are designed to maintain natural drainage, minimizing storm-water runoff.

6. Federal & State Regulatory Compliance

- **FAA Compliance**: The facility will be registered with the FCC and, if required based on height and proximity to regional airports, filed with the Federal Aviation Administration (FAA) to ensure full lighting and marking compliance.
- **Telecommunications Act of 1996**: The request aligns with federal standards encouraging efficient wireless network deployment without unreasonable discrimination or prohibition of service.

7. Conclusion & Request for Action

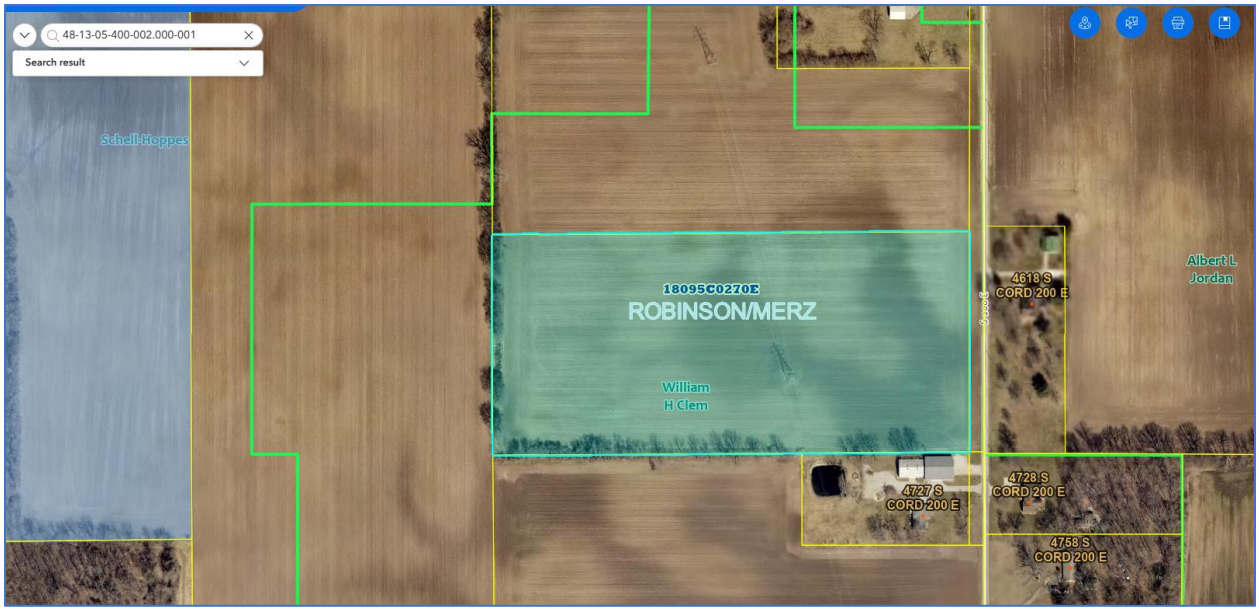
The proposed 199-foot overall wireless communications tower at 0 S 200 E represents a low-impact, high quality utility infrastructure addition that directly benefits the residents and public safety operations of Madison County.

The Applicant respectfully requests that the Madison County Board of Zoning Appeals grant approval for this Special Exception Permit. Representatives of the Applicant will be present at the scheduled public hearing to present site plans, structural documentation, and answer any questions from the Board.

Respectfully submitted,

SITE INFORMATION

1. The area is zoned AG and has 18.08 acres.
2. The parcel is not located within a floodplain.
3. Land use is generally agricultural
4. The site fronts S 200 E, which is a local road in the county thoroughfare plan.



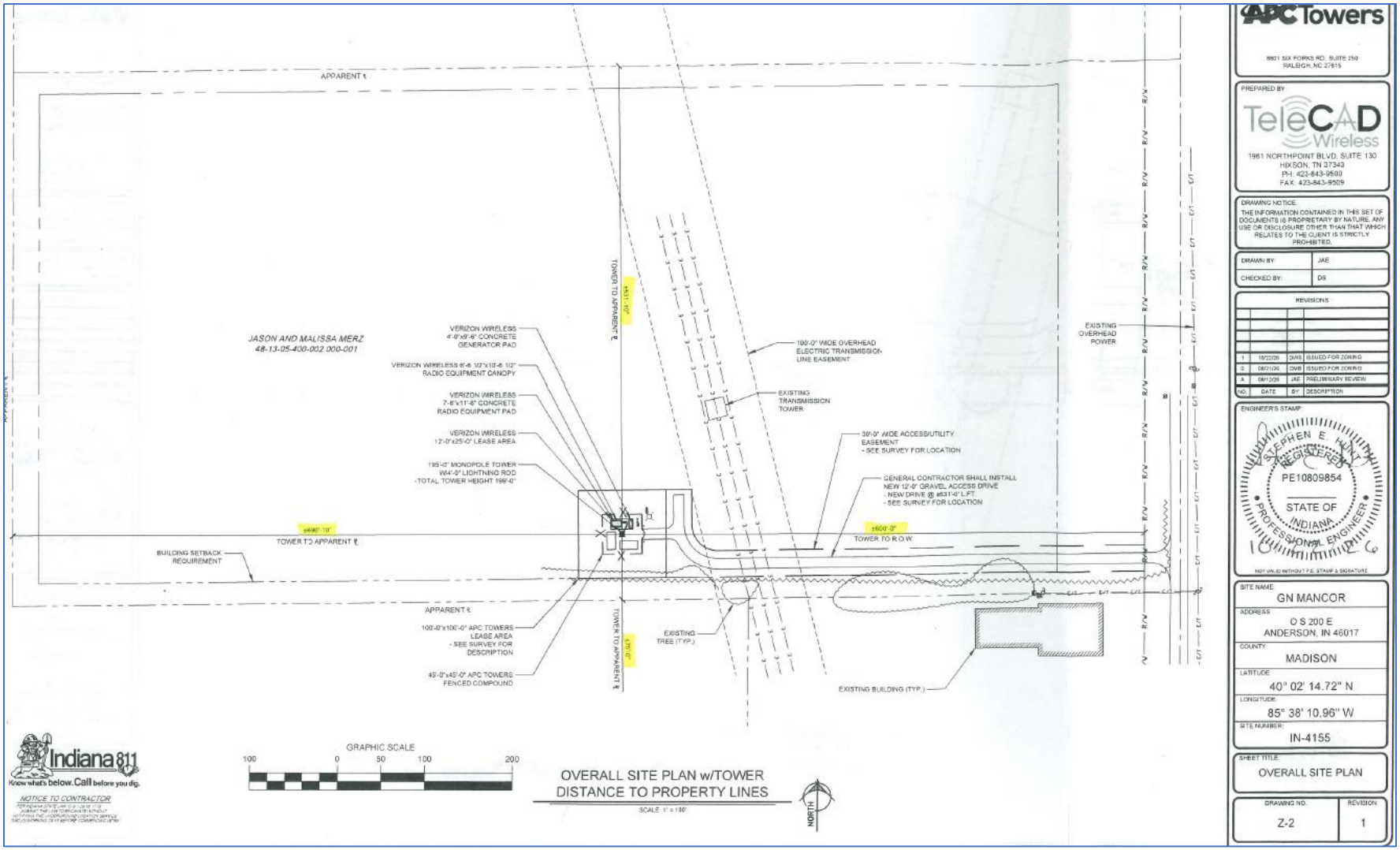
Vicinity



Site overview with tower location and distance to nearest residence.


APC Towers
TeleCAD Wireless
OVERALL SITE PLAN
WAERIAL OVERLAY
GRAPHIC SCALE
ANNA UTILITY COLOR CODES
GN MANCOR
MADISON
40° 02' 14.72" N
85° 38' 10.96" W
IN4155
OVERALL SITE PLAN
Z-1
1

Site plan



APC Towers
8601 SIX FORKS RD. SUITE 250
RALEIGH, NC 27615

PREPARED BY:
TeleCAD Wireless
1961 NORTHPOINT BLVD. SUITE 130
HIXSON, TN 37343
PH: 423-843-9500
FAX: 423-843-9509

DRAWING NOTICE:
THE INFORMATION CONTAINED IN THIS SET OF DOCUMENTS IS PROPRIETARY BY NATURE. ANY USE OR DISCLOSURE OTHER THAN THAT WHICH RELATES TO THE CLIENT IS STRICTLY PROHIBITED.

DRAWN BY:	JAE
CHECKED BY:	DS

REVISIONS

NO.	DATE	BY	DESCRIPTION
1	10/22/26	DWB	ISSUED FOR ZONING
2	09/21/26	DWB	ISSUED FOR ZONING
3	09/13/26	JAE	PRELIMINARY REVIEW

ENGINEER'S STAMP:
STEPHEN E. HUNT
REGISTERED
PE10809854
STATE OF INDIANA
PROFESSIONAL ENGINEER
NOT VALID WITHOUT P.E. STAMP & SIGNATURE

SITE NAME:	GN MANCOR
ADDRESS:	O S 200 E ANDERSON, IN 46017
COUNTY:	MADISON
LATITUDE:	40° 02' 14.72" N
LONGITUDE:	85° 38' 10.96" W
SITE NUMBER:	IN-4155
SHEET TITLE:	OVERALL SITE PLAN
DRAWING NO.:	Z-2
REVISION:	1

ZONING REQUIREMENTS

Telecommunication Facility Standards (TF)

6.18 Telecommunication Facilities Standards (TF)

TF-01: This Telecommunication Facility Standards section applies to the following districts:

AP AG CR R1 R2 R3 MR MH PR IS LC GC HC LI CI

The purpose of this section is to allow for the provision of adequate reliable public and private telecommunication service and to maximize the use of any transmission tower and tower site in order to reduce the total number of towers and locations needed to serve the telecommunications needs of the area; to minimize adverse, undesirable visual effects of towers through careful design, siting, and vegetative screening. All wireless telecommunication facilities shall meet the following provisions:

A. **Required Approvals:** The placement of telecommunications facilities shall met the following approval requirements as detailed in this section:
   a. The installation of new antenna on existing towers, including legal non-conforming towers, and existing alternative structures (such as water towers, buildings, or church steeples) may be approved by the Planning Director subject to conformance with all applicable requirements of this Ordinance.
   b. The installation of new accessory structures to support the installation of antenna on existing towers or alternative structures may be approved by the Planning Director subject to conformance with the applicable requirements of this Ordinance.
   c. The installation of new towers shall be approved either by the Planning Director as a permitted use or by the Board of Zoning Appeals as a special use consistent with the provisions of this section.

B. **Determination of Tower Need:** Any proposal for a new telecommunications tower shall only be approved if the applicant submits verification that the antennas planned for the proposed tower cannot be accommodated on any existing or approved towers or structures within a 3 mile radius of the proposed tower location due to one or more of the following reasons:
   a. The antennas would exceed the structural capacity of the existing or approved tower or structure as documented by a qualified and licensed professional engineer, and the existing or approved tower, building or structure cannot be reinforced, modified, or replaced to

TF-02: This Telecommunication Facility Standards section applies to the following districts:

AP AG CR R1 R2 R3 MR MH

Wireless telecommunications facilities shall require approval as a Special Use from the Board of Zoning Appeals and shall meet all the following requirements in addition to the general requirements and all other applicable provisions of this Ordinance:

A. The tower shall be a monopole design, and shall be setback from any property line a distance equal to at least 100% the height of the tower. Towers shall not be permitted in any required front yard.

B. The maximum height of the tower shall be 125 feet. The maximum height of any accessory structure shall be 15 feet

C. The fence enclosing the facility shall be opaque and of wood, brick, or stone construction. Opaque, 8 foot tall wooden gates, matching any wooden fence, or painted to match a fence of another material shall be provided to access the facility.

In Indiana, the maximum height for cell towers is generally 200 feet.
Here's a more detailed breakdown:

- **General Height:** Cell towers in Indiana typically range from 50 to 200 feet in height.

- **FAA Compliance:** All towers and antennas must comply with FAA tall structure requirements.
- **Small Cell Height:** Small cells, which are low-power, short-range radio antennas, can be mounted at heights of 50 feet or less.
- **Local Regulations:** While the state has laws limiting local government's ability to regulate small cell installations, local municipalities may have their own regulations regarding cell tower height.



American Cancer Society cancer.org | 1.800.227.2345

Cell Phone Towers

The widespread use of cell phones in recent decades has led to a large increase in the number of cell phone towers (also known as **base stations**) being placed in communities. These towers have electronic equipment and antennas that receive and transmit cell phone signals using radiofrequency (RF) waves[1].

- How do cell phone towers expose people to RF waves?
- Do cell phone towers cause cancer?
- What about 5G networks?

Cell phone towers are still relatively new, and many people are understandably concerned about whether the RF waves they give off might possibly have health effects.

At this time, there's no strong evidence that exposure to RF waves from cell phone towers causes any noticeable health effects. However, this does not mean that the RF waves from cell phone towers have been proven to be absolutely safe. Most expert organizations agree that more research is needed to help clarify this, especially for any possible long-term effects.

American Cancer Society, 2020

Staff also contacted the Madison County Health Department. Their response follows.



RE: [EXTERNAL] CELL PHONE TOWER - 0 W ST RD 32, ANDERSON IN

Joseph Davis
To Larry Strange
Cc Christopher Capshaw

Reply | Reply All | Forward

Wed 3/19/2025 2:51 PM

Tough to say whether there are health risks from RF radiation from cell towers. Some studies say there aren't, and others say there are. Long term exposure research is lacking I think. Most sources say further research is needed. FCC says RF waves emitted by cell towers are well below safety guidelines. Theres a link below to FCC FAQ on RF waves. American Cancer Society also has a good read regarding the cancer part. It doesn't address the other concerns though. I probably wouldn't want one right next to my house. It could be perfectly fine, but I wouldn't want it there just in case.

https://www.cancer.org/cancer/risk-prevention/radiation-exposure/cellular-phone-towers.html

Joe Davis
Deputy Administrator
Environmental Supervisor
Madison County Health Department
206 E 9th Street
Anderson, IN 46016
765-641-9537
jdavis@madisoncounty.in.gov

ANALYSIS

The proposed cell tower location is in a location where there are only a couple of houses within 500' of the tower. The area is generally agricultural. There is a residential area south of the proposed site. As shown on the maps below, the proposed project will increase the indoor coverage from good outdoor coverage only to good indoor coverage. Generally, what these maps show is that the area where the proposed tower will go will increase the indoor coverage from current situation. This will be done by offloading the other towers shown on the maps in black dots.

The area is agricultural in use with the nearest cluster of housing at E 300 S. The property immediately adjacent to the parcel on which the tower is being placed (with the house) is the same owner. That house is about 475 feet from the tower. There 100 x 100 placement box for the tower is about 80' from an adjacent overhead power line easement. The tower has a collapse factor of 75 feet so per the company there is sufficient room.



There are no legal drains in the area so there should be no drainage issues.

Coverage Information

August 25th,2026

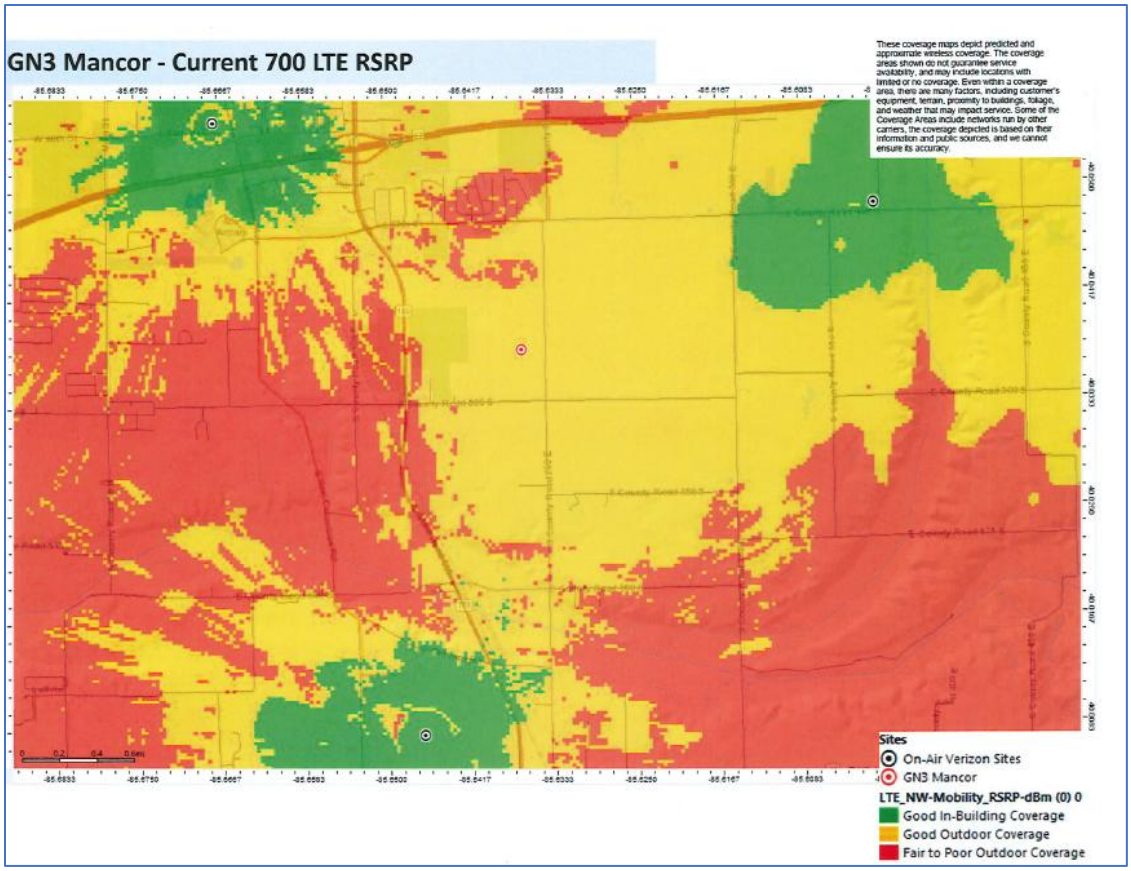
RE: The Board of Zoning Madison County, Zoning Plots; Site Name: GN3 Mancor
To Elizabeth Burns:

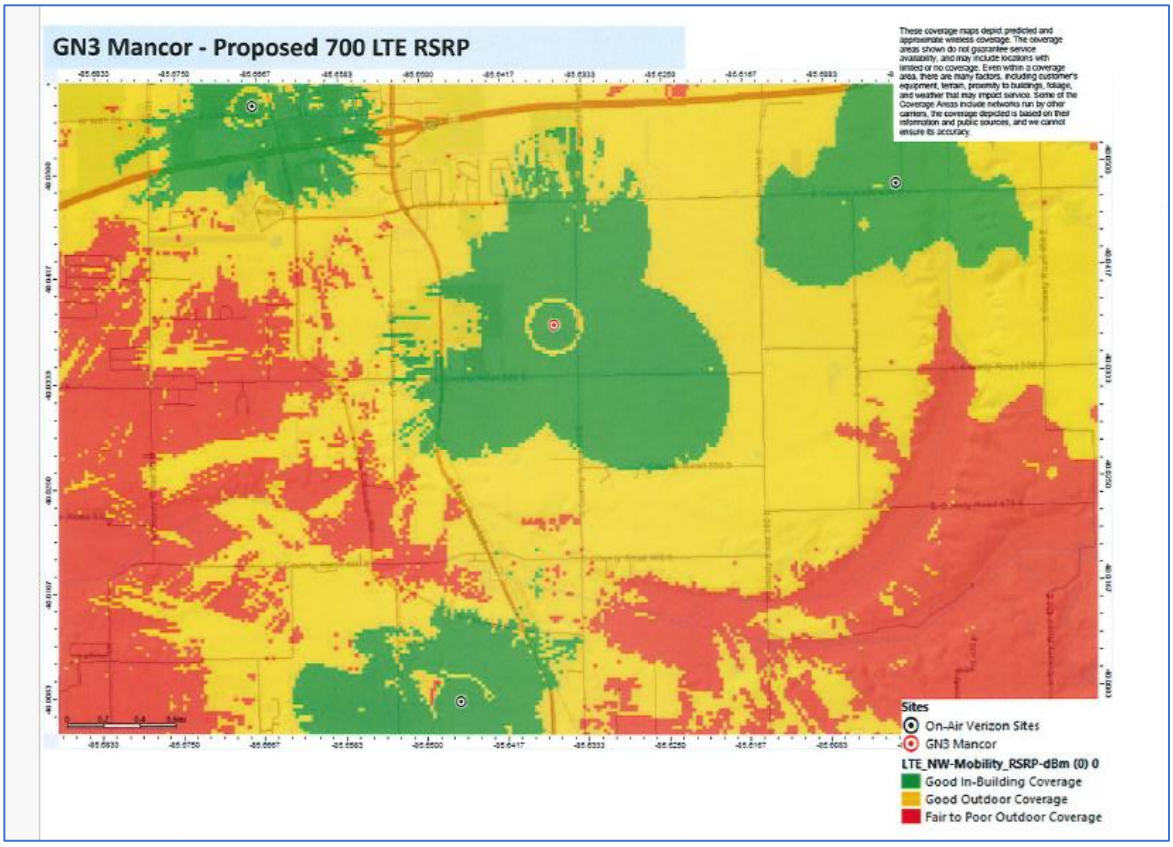
This map is not a guarantee of coverage and may contain areas with no service. This map reflects a depiction of predicted and approximate wireless coverage of the network and is intended to provide a relative comparison of coverage. The depictions of coverage do not guarantee service availability as there are many factors that can influence coverage and service availability. These factors vary from location to location and change over time. The coverage areas may include locations with limited or no coverage. Even within a coverage area shown, there are many factors, including but not limited to, usage volumes, service, outage, customer's equipment, terrain, proximity to buildings, foliage, and weather that may impact service.

The proposed site is needed to offload capacity from existing sites. The maps also reflect the predicted coverage area that will be offloaded from existing sites and transferred to the proposed site.

Sincerely,

Jessica Maldonado
RF Engineer, Verizon Wireless


GN3 Mancor - Current 700 LTE RSRP
These coverage maps depict predicted and approximate wireless coverage. The coverage areas shown do not guarantee service availability, and may include locations with limited or no coverage. Even within a coverage area, there are many factors, including customer's equipment, terrain, proximity to buildings, foliage, and weather that may impact service. Some of the Coverage Areas include networks run by other carriers, the coverage depicted is based on their information and public sources, and we cannot ensure its accuracy.
Sites
On-Air Verizon Sites
GN3 Mancor
LTE_NW-Mobility_RSRP-dBm (0) 0
Good In-Building Coverage
Good Outdoor Coverage
Fair to Poor Outdoor Coverage


GN3 Mancor - Proposed 700 LTE RSRP
These coverage maps depict predicted and approximate wireless coverage. The coverage areas shown do not guarantee service availability, and may include locations with limited or no coverage. Even within a coverage area, there are many factors, including customer's equipment, terrain, proximity to buildings, foliage, and weather that may impact service. Some of the Coverage Areas include networks run by other carriers, the coverage depicted is based on their information and public sources, and we cannot ensure its accuracy.
Sites
On-Air Verizon Sites
GN3 Mancor
LTE_NW-Mobility_RSRP-dBm (0) 0
Good In-Building Coverage
Good Outdoor Coverage
Fair to Poor Outdoor Coverage



RECOMMENDATION (PENDING)

The staff position is generally favorable due to the benefits to the overall community with the increased cell coverage capacity with benefits for educational, work-force related, emergency-medical, and related reasons.

FINDINGS of FACT for SPECIAL USE

[redacted]

[redacted]

[redacted]

[redacted]

2026-V-041

STAFF FINDINGS

The petitioner is requesting relief from the landscaping requirements (6.18(TF-02)) on the south boundary. The purpose is to allow the facility to be located to minimize agricultural disruption while minimizing any other issues. The applicant proposes an opaque enclosure consisting of a 6-foot shadowbox wood fence positioned directly adjacent to the tree line on the east border. This is requested because the trees surrounding the compound enclosure would interfere with agricultural tillage, drainage tiles, crop sunlight and farm machinery access.

Telecommunication Facility Standards (TF)
(continued)

f. Evergreen buffer plantings shall be located around the outermost perimeter of the security fence of all wireless telecommunications facilities, including any guy wires and anchors.
   1. If evergreen hedges are used they shall be a minimum of 5 feet tall at the time of planting and planted a maximum of 3 feet on center.
   2. If evergreen trees are used they shall be a minimum of 6 feet tall at the time of planting and planted a maximum of 10 feet on center.
   3. Existing vegetation (trees and shrubs) shall be preserved to the maximum extent possible.

RECOMMENDATION

Staff recommends approval, if the special use is approved. This variance will allow the technological improvement without disrupting the agricultural use of the property.

FINDINGS of FACT for VARIANCE

1. ***WILL the approval be injurious to the public health, safety, morals, and general welfare of the community?*** No. The proposed use as presented should not negatively impact the public health, safety, morals, and general welfare of the community. The proposed buffer will be sufficient given the adjoining land uses.

2. ***Will the use and value of the area adjacent to the property included in the variance be affected in a substantially adverse manner?*** There should be no negative impacts on property value.

3. ***Will the strict application of the terms of the zoning ordinance result in practical difficulty in the use of the property.*** *Yes, they would not be able to construct the tower in a way that maximizes agricultural use of the surrounding land.*

2026-V-042

STAFF FINDINGS

The petitioner is requesting side setback relief to allow a reduced yard setback of 75' from the south property line where a setback equal to 100% of the overall height (199') is required. The structures are designed to collapse on themselves, so this setback reduction will not pose a safety issue (verification letter is submitted with the file). The reasons cited include preservation of agricultural land, corridor

and infrastructure alignment in the tower's proximity to the 100' wide electrical easement. It also notes that the pole is designed to collapse within 75.' The practical difficulty would be associated with how best to minimize agricultural disruption.

RECOMMENDATION

Staff recommends approval if the special use is approved.

FINDINGS of FACT for VARIANCE

1. ***WILL the approval be injurious to the public health, safety, morals, and general welfare of the community?*** No. The proposed use as presented should not negatively impact the public health, safety, morals, and general welfare of the community. The tower is designed to fall in on itself.

2. ***Will the use and value of the area adjacent to the property included in the variance be affected in a substantially adverse manner?*** There should be no negative impacts on property value.

3. ***Will the strict application of the terms of the zoning ordinance result in practical difficulty in the use of the property.*** *Yes, they would not be able to construct the tower in a way that maximizes communication capacity.*

2026-V-043

STAFF FINDINGS

The petitioner is requesting a tower higher than the county's maximum of 125'. The proposed tower height and design is within the parameters of other towers in Indiana. The petitioner is requesting a 199' tower. The RF engineering studies provided demonstrate the need. The following is from their letter of intent:

> **3. Height Increase Relief — Section 6.18(TF-02)(B)**
> The Applicant requests an overall facility height of 199 feet (195-foot monopole plus 4-foot lightning arrestor) instead of the standard 125-foot limit in the CR district.
> - **Overcoming Local Tree Canopy & Topography:** RF engineering studies confirm that a 125-foot tower cannot clear the tall, mature tree canopy present in the immediate area, which causes severe signal attenuation in this area of Madison County.
> - **Co-Location for Multiple Carriers:** A 199-foot structure provides sufficient vertical clearance for up to three (3) total wireless providers as well as emergency service communications, preventing the need for additional towers in neighboring areas.

RECOMMENDATION

Staff recommends approval if the special use is approved.

FINDINGS of FACT for VARIANCE

1. ***WILL the approval be injurious to the public health, safety, morals, and general welfare of the community?*** No. The proposed use as presented should not negatively impact the public health, safety, morals, and general welfare of the community.

2. ***Will the use and value of the area adjacent to the property included in the variance be affected in a substantially adverse manner?*** There should be no negative impacts on property value.

3. ***Will the strict application of the terms of the zoning ordinance result in practical difficulty in the use of the property.*** *Yes, they would not be able to construct the tower in a way that maximizes communication capacity.*

Verification Letters

verizon

August 25th, 2026

TO: Elizabeth Burns
Planning & Zoning Administrator
Madison County Planning Department
16 E 9th Street, Room 200
Anderson, IN 46016

RE: Proposed Verizon Communications Facility
Site Name: GN3 Mancor
Type of Tower: New Monopole 190ft
Nearest Address: S 200 E, Anderson, IN 46017

To whom it may concern:

As a radio frequency engineer for Verizon, I am providing this letter to state the need for the proposed Verizon site called GN3 Mancor ("Proposed Site") in Anderson, Indiana at the total requested height of 190 feet. The Proposed Site is necessary to improve coverage and offload 4G and 5G data and voice capacity in and around Anderson, Indiana ("Gap Area"). The Proposed Site will offload excess data traffic from the following nearby sites that are currently operating near or at capacity: GN Anderson South (Land east of 815 E 60th Street, Anderson, IN, 46013), GN Lakewood (3967 S CR 380 E , Anderson, IN,46011) and GN3 Emporia (1396 East US 36, Markleville, IN, 46056). The Proposed Site will allow Verizon to address an area that is currently experiencing high demand for wireless high-speed data. Growth forecasts in and around the Gap Area have triggered the need for an additional site in order to allow Verizon to provide its customers in the area with the best experience on their existing 4G wireless devices and new 5G mobile and fixed home services. By addressing this need, customers will experience improved access to mobile voice services, enhanced 911 for public safety, and high-speed broadband 4G/5G wireless data services.

The requested overall tower height of 190 feet is the minimum height necessary to provide continuous coverage to the Gap Area and to ensure that the proposed site works well with other existing network sites in the surrounding areas. The proposed 190-foot tower will give Verizon the opportunity for growth on a structurally sound facility and allow for the possibility of new future collocators. A tower with a height less than 190 feet will not provide the coverage and capacity needed, and another new tower would be needed to provide additional coverage and capacity in the near future.

Verizon cares about the communities it serves and prefers to collocate on existing structures when feasible. Here, there are no existing towers in the search area that can provide Verizon the coverage and capacity needed in the Gap Area. The Proposed Site has been designed, and will be constructed and operated in a manner that satisfies regulations and requirements of all applicable governmental agencies that have been charged with regulating tower specifications, operation, construction, and placement, including the FAA and FCC.

RF emission readings at the Proposed Site in the accessible areas would be well below the applicable limits for FCC Uncontrolled/General Population and FCC Controlled/Occupational environments as outlined in 47 CFR 1.1301 through 1.1319. The site would carry appropriate RF emission signage to the public entering the site area.

This Proposed Site would transmit frequencies within the licensed frequency bands and the power limitations set by FCC regulatory authority. The Proposed Site will go through a complete rigorous regulatory process before it comes on-air to provide service to our customers.

Verizon currently holds multiple FCC licenses in Madison County in order to provide multiple forms of wireless services to its current and prospective customers.

Sincerely,

Jessica Maldonado

Jessica Maldonado

RF Engineer, Verizon

September 15, 2026

Jonathan Greene
APC Tower's
8601 Six Forks Road, Suite 250,
Raleigh, NC 27615

B+T Group
1717 S. Boulder, Suite 300
Tulsa, OK 74119
(918) 587-4630
btwo@btgrp.com

Subject: **Fall Certification Letter**
Arcosa Designation: **Arcosa Project Number:** **C716**
Arcosa Site Name: **GN Mancor (IN-4155)**
Engineering Firm Designation: **B+T Group Project Number:** 26-004707

Site Data:
GN Mancor (IN-4155)
190' Monopole

To Whom it May Concern:

As Requested by Arcosa Telecom Structures on behalf of APC Tower's, B+T Group is pleased to submit this "Fall Certification Letter" for the 190' Monopole to be constructed at the **GN Mancor (IN-4155)** site.

This pole will be designed in accordance with the TIA 222-H standard for Madison County, IN.
The pole will be designed to support antennas and transmission lines for three wireless carriers. The design criteria are more particularly described as follows:

Design Wind Speed: 115 mph 3-sec gust (no ice), 40 mph 3-sec gust (1.5" ice)
Structure Class: II
Exposure Category: C
Topographic Category: 1

185'—Wireless Carrier 1 (CaAa= 42,000 sq in w/ (18) 1 5/8" transmission lines
170'—Wireless Carrier 2 (CaAa= 30,000 sq in w/ (12) 1 5/8" transmission lines
155'—Wireless Carrier 3 (CaAa= 30,000 sq in w/ (12) 1 5/8" transmission lines

It is our understanding that this Monopole structure will be designed such that, if a failure were to occur due to a significant storm or other event, the pole would fall within a radius of 75' from the base of the structure. Although the pole would not be designed to fail, stronger sections that required by analysis would be provided in the lower sections of the pole, resulting in an increased safety factor in the lower sections. In the highly unlikely event that this pole were to experience operational failure due to catastrophic wind loading, the design would enable the pole to fail through compression buckling. Failure in this manner would result in the upper portion of the pole buckling and folding over the lower portion, resulting in a fall radius of 75' from the base of the pole. This opinion does not consider unpredictable extreme catastrophic events for which the structure is not designed. However, any damage to surrounding property caused by the pole failing during such an event would be relatively insignificant when compared to the damage caused to the surrounding property by the event itself. Please contact us should you have any questions concerning the safety and design of the monopole.

Letter prepared by: Clint Coody

Submitted by: B+T Group, Inc.

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REGISTERED
No. 10303178
STATE OF
INDIANA
PROFESSIONAL ENGINEER

9/15/26

Chad E. Tuttle, P.E.

Site Photos



View from site looking north



View from site looking east



View from site looking south



View from site looking west