



Referral Early Consultation

Date: June 12, 2026

To: Distribution List (See Attachment A)

From: Emily DeAnda, Associate Planner
Planning and Community Development

Subject: STAFF APPROVAL APPLICATION NO. PLN2026-0040 – T-MOBILE

Respond By: July 2, 2026

******PLEASE REVIEW REFERRAL PROCESS POLICY******

The Stanislaus County Department of Planning and Community Development is soliciting comments from responsible agencies under the Early Consultation process to determine: a) whether or not the project is subject to CEQA and b) if specific conditions should be placed upon project approval.

Therefore, please contact this office by the response date if you have any comments pertaining to the proposal. Comments made identifying potential impacts should be as specific as possible and should be based on supporting data (e.g., traffic counts, expected pollutant levels, etc.). Your comments should emphasize potential impacts in areas which your agency has expertise and/or jurisdictional responsibilities.

These comments will assist our Department in preparing the conditions for a Staff Approval. Therefore, please list any conditions that you wish to have included as well as any other comments you may have. Please return all comments and/or conditions as soon as possible or no later than the response date referenced above.

Thank you for your cooperation. Please call (209) 525-6330 if you have any questions.

Applicant: Tanner Young on behalf of T-Mobile/ATC

Project Location: 6155 Bentley Road, between Claribel and Patterson Roads in the Oakdale area.

APN: 063-030-004

Williamson Act Contract: 1971-0203

General Plan: Agriculture

Current Zoning: General Agriculture (A-2-40)

Project Description: Request to extend the height of an existing 98-foot-tall monopole style cellular tower to a new height of 130-feet within an existing 3,600± square-foot chain linked fenced lease area, on a 157.61± acre parcel in the General Agriculture (A-2-40) zoning district. As part of this request, the applicant proposes to collocate six new T-Mobile antennas at the 126-foot centerline. The following equipment improvements are proposed as part of this request: two existing meters will be relocated within the existing lease area; a new power conduit and new conduit route is proposed to extend from an existing power pole on-site to a proposed meter within the lease area; and a new T-Mobile ice bridge within the lease area. Ground equipment associated with the collocation is proposed to be enclosed within the existing leasing area. An existing 20-foot-wide, 123-foot-long non-exclusive access and utility easement provides access from the leased area to Bentley Road.

The existing cell tower was initially permitted under Staff Approval Permit No. 1995-3036 – Air Touch Cellular – Brichetto. The proposed request meets the County’s siting standards of Chapter 21.91 – Communication Facilities of the County Code. The site is currently improved with a single-family dwelling and accessory agricultural structures.

The current request is an Eligible Facilities Request under Section 6409(a) of the Middle-Class Tax Relief and Job Creation Act of 2012 for the modification of an existing facility. Eligible Facilities Requests can only be denied or required to be modified if in violation of a generally applicable law related to public health and safety.

Full document with attachments available for viewing at:
<http://www.stancounty.com/planning/pl/act-projects.shtm>



STAFF APPROVAL APPLICATION NO. PLN2026-0040 – T-MOBILE**Attachment A****Distribution List**

X	CROP DUSTERS	X	STAN CO BUILDING PERMITS DIVISION
X	FIRE PROTECTION DIST: OAKDALE RURAL	X	STAN CO HAZARDOUS MATERIALS
X	IRRIGATION DIST: OAKDALE	X	STAN CO PUBLIC WORKS
X	MOSQUITO ABATEMENT DIST: EASTSIDE	X	STANISLAUS FIRE PREVENTION BUREAU
X	PACIFIC GAS & ELECTRIC	X	SURROUNDING LAND OWNERS

**STANISLAUS COUNTY
CEQA REFERRAL RESPONSE FORM**

TO: Stanislaus County Planning & Community Development
1010 10th Street, Suite 3400
Modesto, CA 95354

FROM: _____

SUBJECT: STAFF APPROVAL APPLICATION NO. PLN2026-0040 – T-MOBILE

Based on this agency's particular field(s) of expertise, it is our position the above described project:

- _____ Will not have a significant effect on the environment.
- _____ May have a significant effect on the environment.
- _____ No Comments.

Listed below are specific impacts which support our determination (e.g., traffic general, carrying capacity, soil types, air quality, etc.) – (attach additional sheet if necessary)

- 1.
- 2.
- 3.
- 4.

Listed below are possible mitigation measures for the above-listed impacts: *PLEASE BE SURE TO INCLUDE WHEN THE MITIGATION OR CONDITION NEEDS TO BE IMPLEMENTED (PRIOR TO RECORDING A MAP, PRIOR TO ISSUANCE OF A BUILDING PERMIT, ETC.):*

- 1.
- 2.
- 3.
- 4.

In addition, our agency has the following comments (attach additional sheets if necessary).

Response prepared by:

Name	Title	Date
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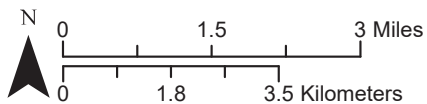
T-MOBILE

**SAA
PLN2026-0040**

AREA MAP

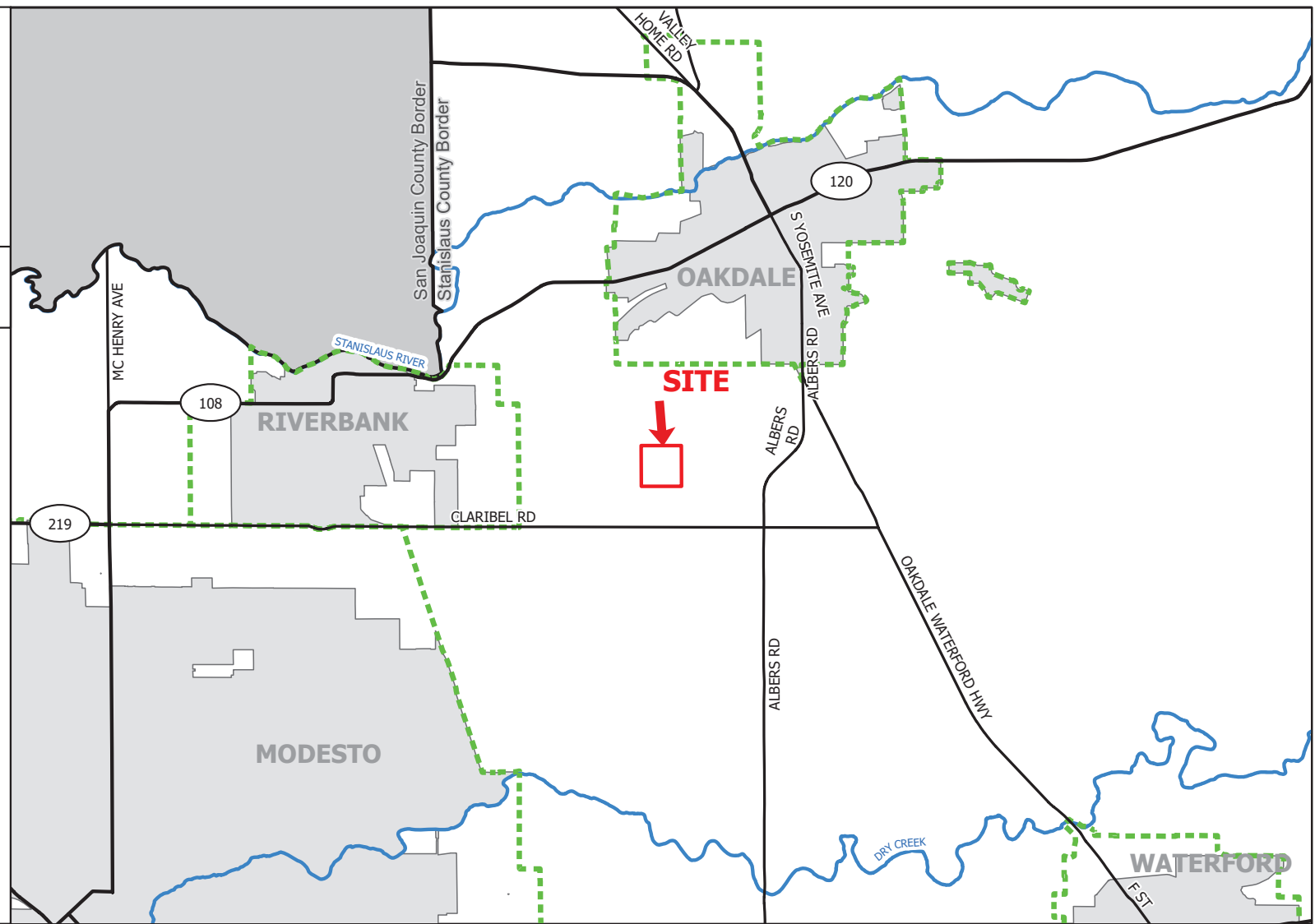
LEGEND

-  Project Site
-  Sphere of Influence
-  Highway
-  Major Road
-  River



Source: Planning Department GIS

Date Exported: 6/8/2026



T-MOBILE

**SAA
PLN2026-0040**

GENERAL PLAN MAP

LEGEND

 Project Site

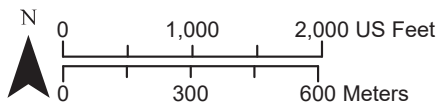
 Parcel

 Street

 Canal

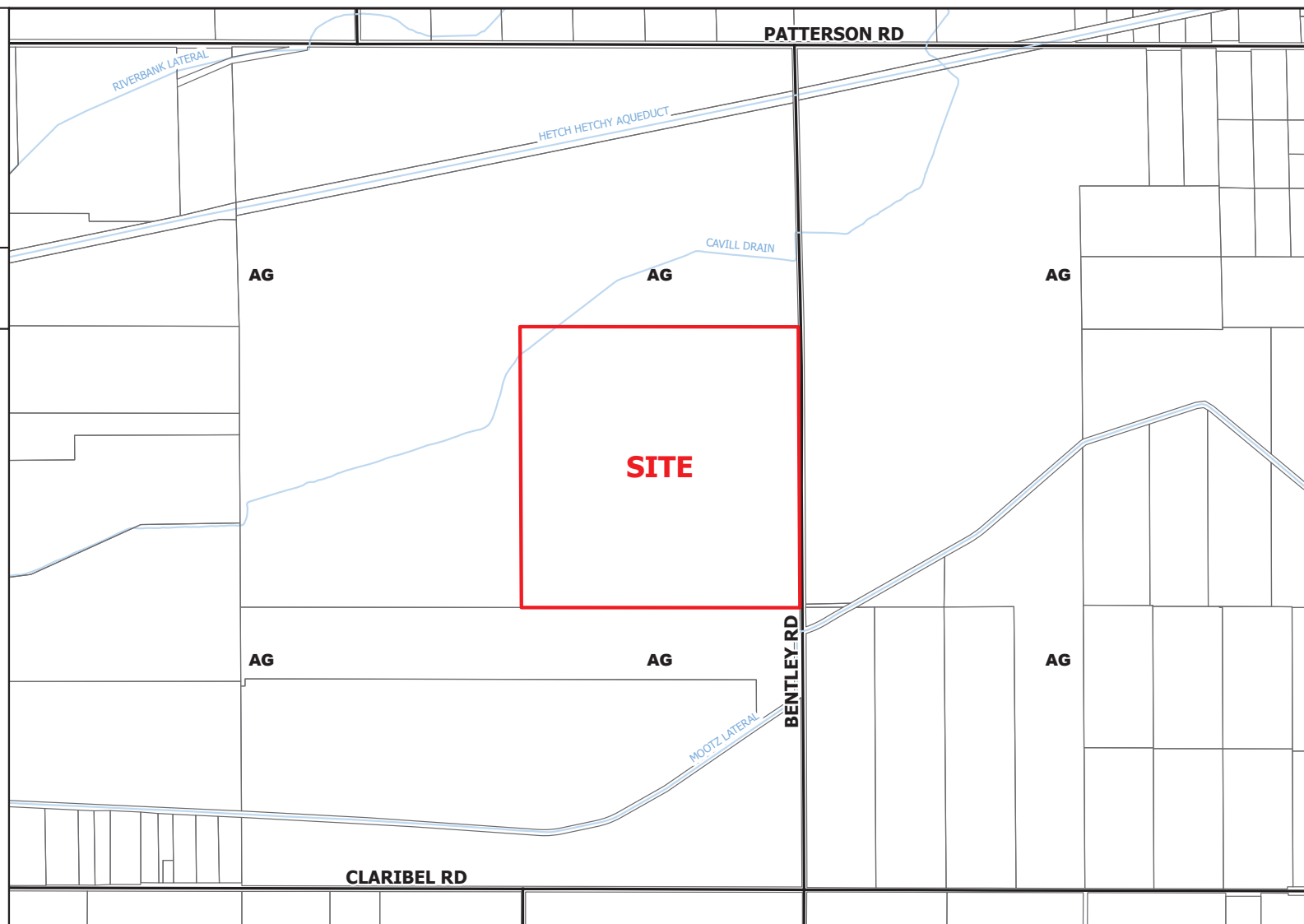
General Plan

 Agriculture (AG)



Source: Planning Department GIS

Date Exported: 6/8/2026



T-MOBILE

**SAA
PLN2026-0040**

ZONING MAP

LEGEND

 Project Site

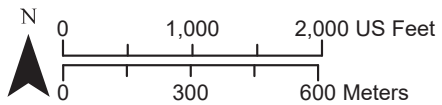
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 Street

 Canal

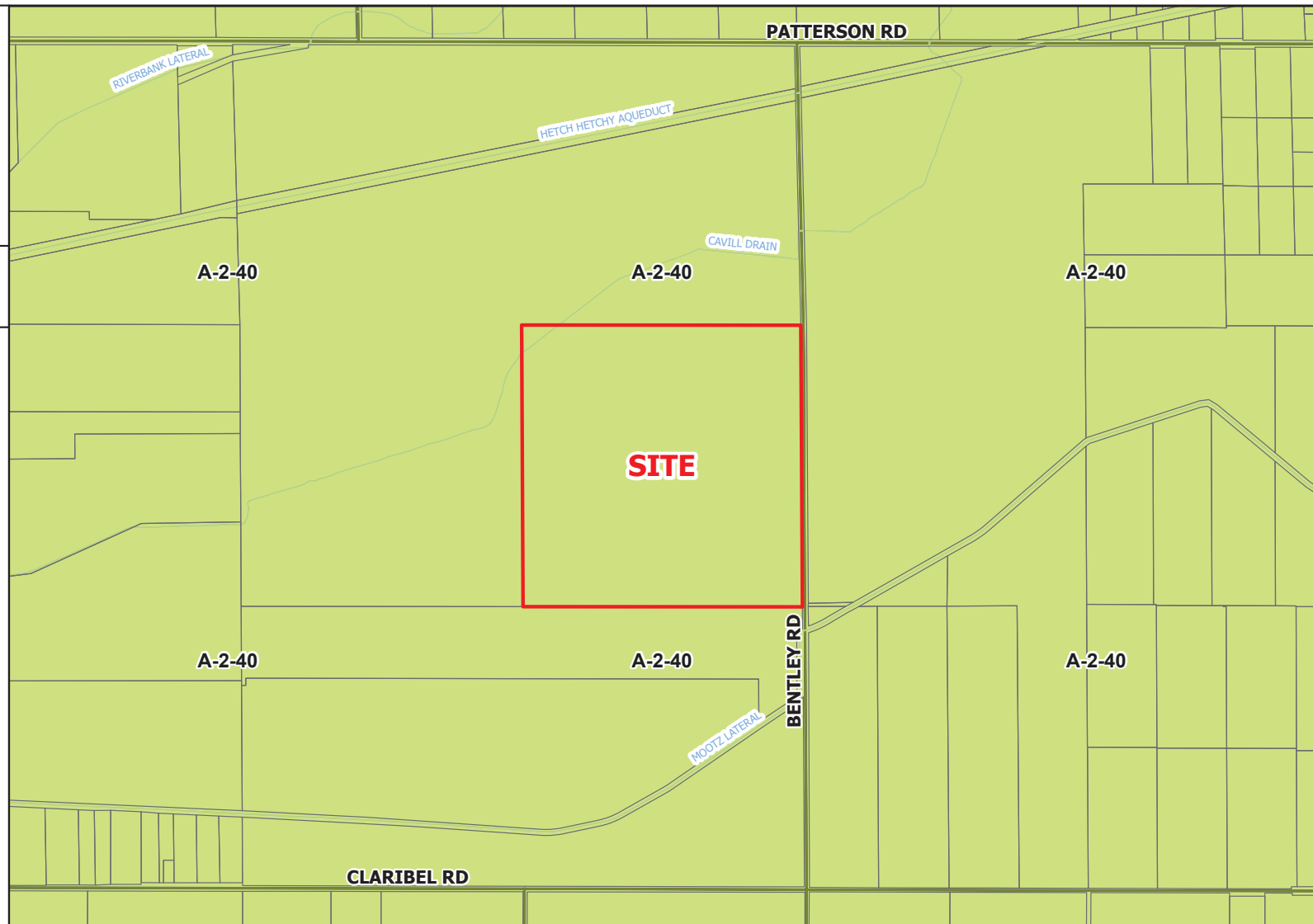
Zoning Designation

 General AG 40 Acre (A-2-40)



Source: Planning Department GIS

Date Exported: 6/8/2026



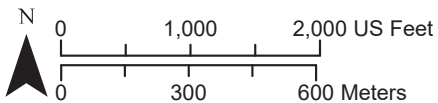
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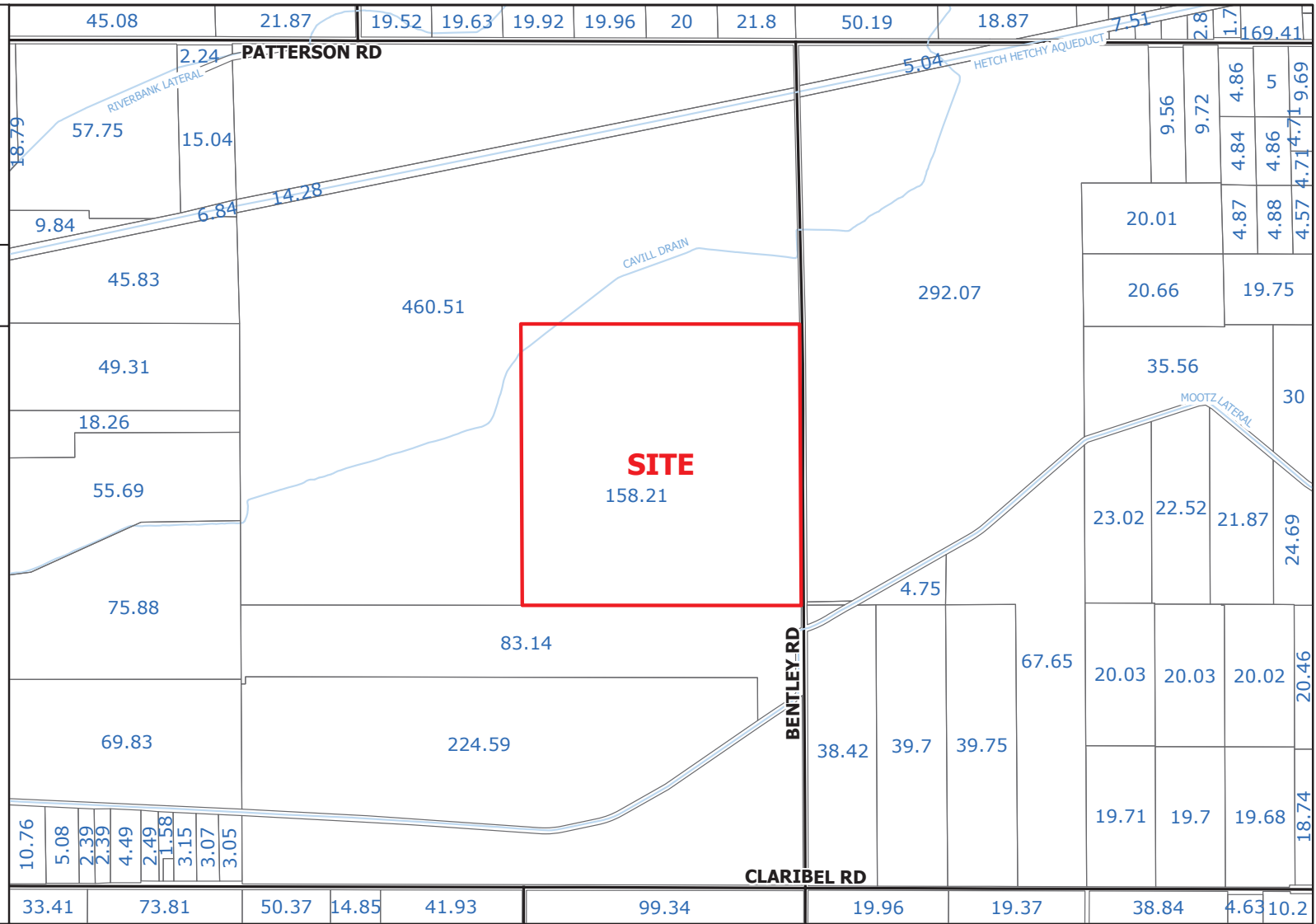
ACREAGE MAP

LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



Source: Planning Department GIS Date Exported: 6/8/2026



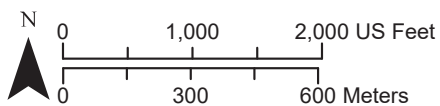
T-MOBILE

**SAA
PLN2026-0040**

2023 AERIAL AREA MAP

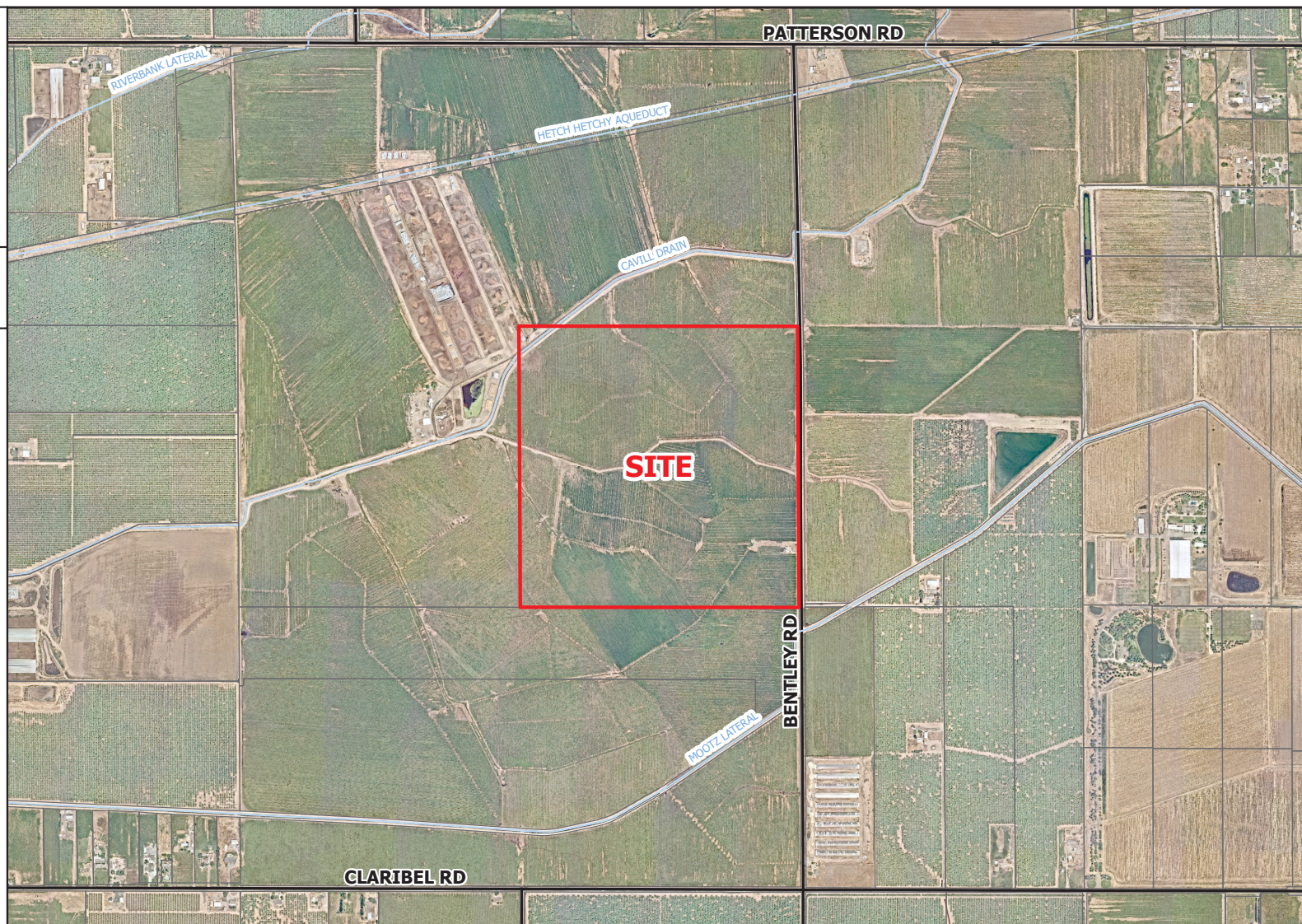
LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



Source: Planning Department GIS

Date Exported: 6/8/2026



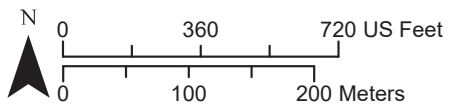
T-MOBILE

**SAA
PLN2026-0040**

2023 AERIAL SITE MAP

LEGEND

-  Project Site
-  Parcel
-  Street
-  Canal



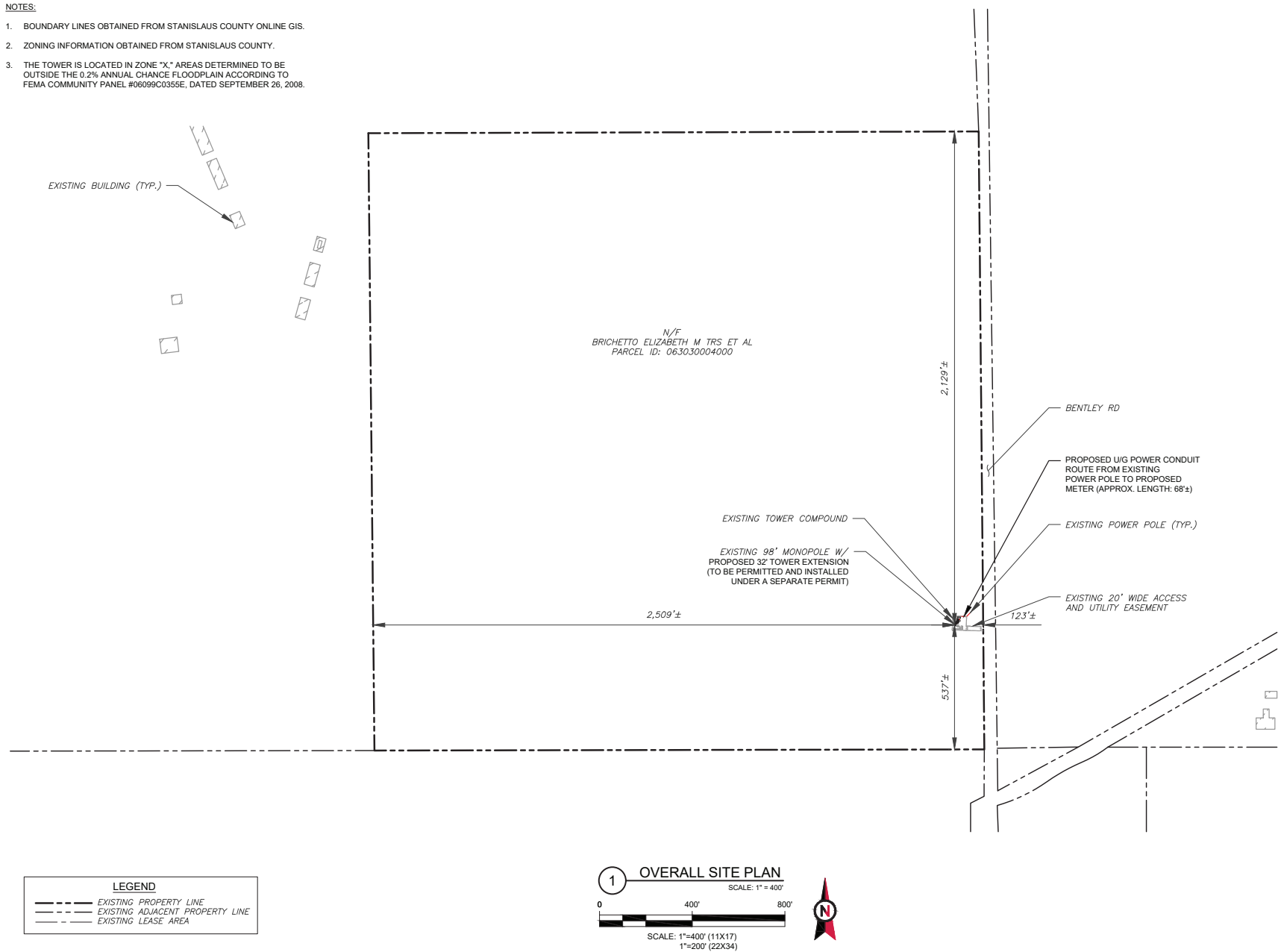
Source: Planning Department GIS

Date Exported: 6/8/2026



NOTES:

1. BOUNDARY LINES OBTAINED FROM STANISLAUS COUNTY ONLINE GIS.
2. ZONING INFORMATION OBTAINED FROM STANISLAUS COUNTY.
3. THE TOWER IS LOCATED IN ZONE "X." AREAS DETERMINED TO BE OUTSIDE THE 0.2% ANNUAL CHANCE FLOODPLAIN ACCORDING TO FEMA COMMUNITY PANEL #06099C0355E, DATED SEPTEMBER 26, 2008.





AMERICAN TOWER

PLANS PREPARED BY:



TEP

326 TRYON ROAD
RALEIGH, NC 27603-3530
OFFICE: (919) 661-6351
www.tepgroup.net

TEP IS A FAMILY OF COMPANIES LICENSED TO PROVIDE DIFFERENT SERVICES IN DIFFERENT JURISDICTIONS. DEPENDING ON THE JURISDICTION, PROFESSIONAL ENGINEERING AND LAND SURVEYING SERVICES ARE PROVIDED BY TEP OPDC, LLC, A DELAWARE LIMITED LIABILITY COMPANY; TEP ENGINEERING, LLC, A NORTH CAROLINA PROFESSIONAL LIMITED LIABILITY COMPANY; OR MEH ENGINEERING, LLC, A NEW YORK PROFESSIONAL LIMITED LIABILITY COMPANY. GENERAL CONTRACTOR SERVICES ARE PROVIDED BY TEP OPDC, LLC, A DELAWARE LIMITED LIABILITY COMPANY. WE ACQUIRE THE REQUISITE LICENSES IN EACH STATE. ADDITIONAL INFORMATION CAN BE OBTAINED FROM THE COMPANY.

REV.	DESCRIPTION	BY	DATE
△	100% CONSTRUCTION	ASB	08/05/25
△	100% CONSTRUCTION	BJO	08/13/25
△	100% CONSTRUCTION	REW	10/10/25
△	100% CONSTRUCTION	BJO	04/03/26
△	100% CONSTRUCTION	BJO	05/06/26

ATC SITE NUMBER:
82606

ATC SITE NAME:
OAKDALE SOUTH CA

T-MOBILE SITE NAME:
ATC OAKDALE SOUTH CA

SITE ADDRESS:
6155 BENTLEY RD
OAKDALE, CA 95361-7940

TEP OpCo, LLC

LICENSED PROFESSIONAL ENGINEER

KYLE FOHN MILLER

C98004

CIVIL

STATE OF CALIFORNIA

SEAL: 05/06/26

T-Mobile

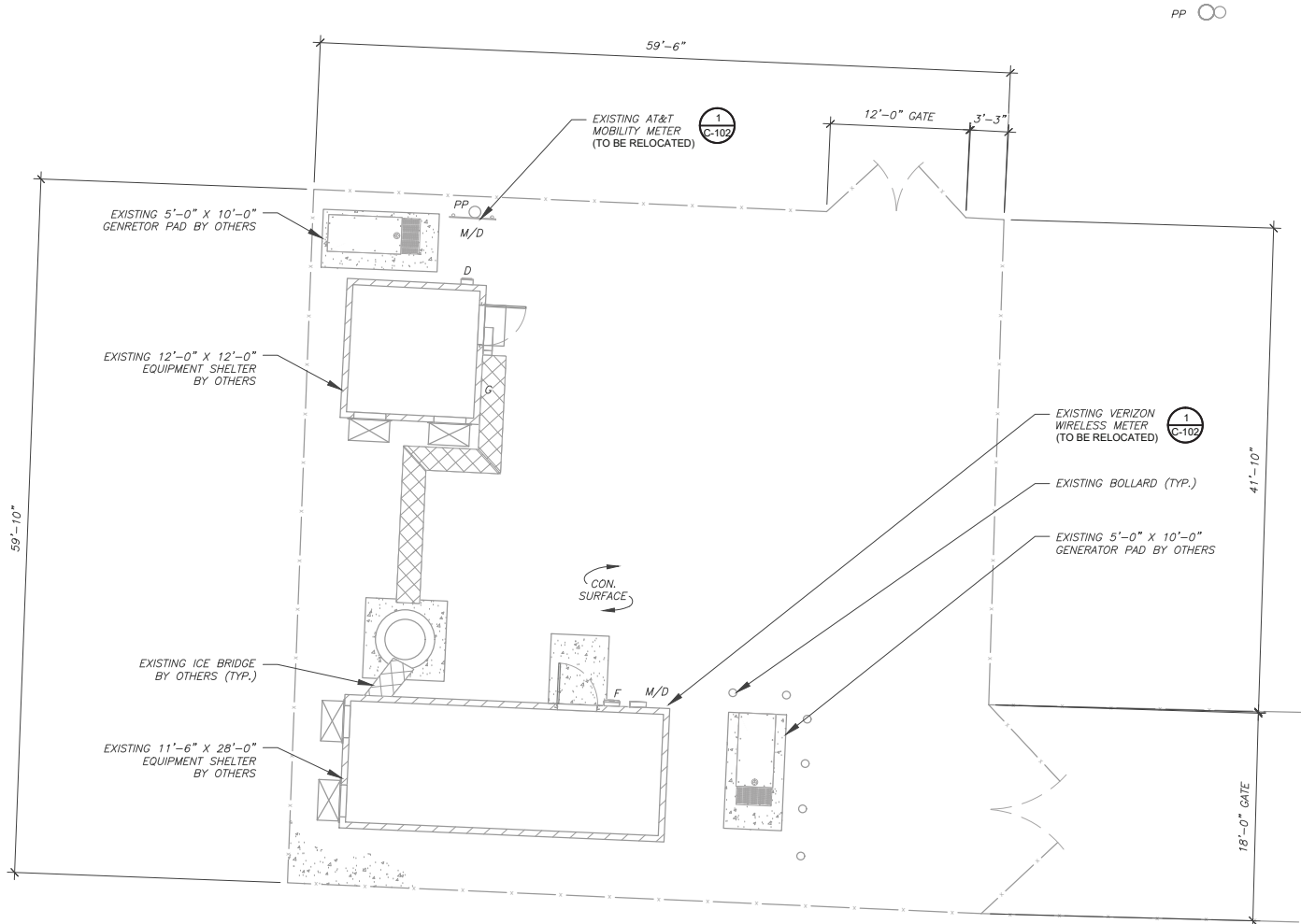
DATE DRAWN:	05/06/26
ATC JOB NO:	15316616
CUSTOMER NAME:	ATC OAKDALE S CA
CUSTOMER ID:	SCL0224A

OVERALL SITE PLAN

SHEET NUMBER: C-001	REVISION: 4
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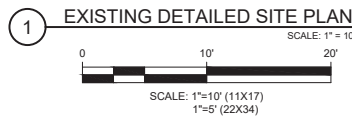
SITE PLAN NOTE:

THIS SITE PLAN REPRESENTS THE BEST PRESENT KNOWLEDGE AVAILABLE TO THE ENGINEER AT THE TIME OF THIS DESIGN. THE CONTRACTOR SHALL VISIT THE SITE PRIOR TO CONSTRUCTION AND VERIFY ALL EXISTING CONDITIONS RELATED TO THE SCOPE OF WORK FOR THIS PROJECT.



LEGEND

⊗	GROUNDING TEST WELL
ATS	AUTOMATIC TRANSFER SWITCH
B	BOLLARD
CSC	CELL SITE CABINET
D	DISCONNECT
E	ELECTRICAL
F	FIBER
GEN	GENERATOR
G	GENERATOR RECEPTACLE
HH, V	HAND HOLE, VAULT
IB	ICE BRIDGE
K	KENTROX BOX
LC	LIGHTING CONTROL
M	METER
PB	PULL BOX
PP	POWER POLE
T	TELCO
TRN	TRANSFORMER
---	CHAINLINK FENCE



AMERICAN TOWER

PLANS PREPARED BY:

TEP

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RALEIGH, NC 27603-3530
OFFICE: (919) 661-6351
www.tepgroup.net

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REV.	DESCRIPTION	BY	DATE
1	PRELIMINARY	YYA	06/20/25
2	100% CONSTRUCTION	ASB	08/05/25
3	100% CONSTRUCTION	BJO	08/13/25

ATC SITE NUMBER:
82606

ATC SITE NAME:
OAKDALE SOUTH CA

T-MOBILE SITE NAME:
ATC OAKDALE SOUTH CA

SITE ADDRESS:
6155 BENTLEY RD
OAKDALE, CA 95361-7940

TEP OpCo, LLC

SEAL: 08/13/25

DATE DRAWN:	08/13/25
ATC JOB NO:	15316616
CUSTOMER NAME:	ATC OAKDALE S CA
CUSTOMER ID:	SCL0224A

EXISTING DETAILED
SITE PLAN

SHEET NUMBER:
C-101

REVISION:
1

SITE PLAN NOTES:

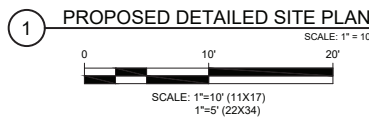
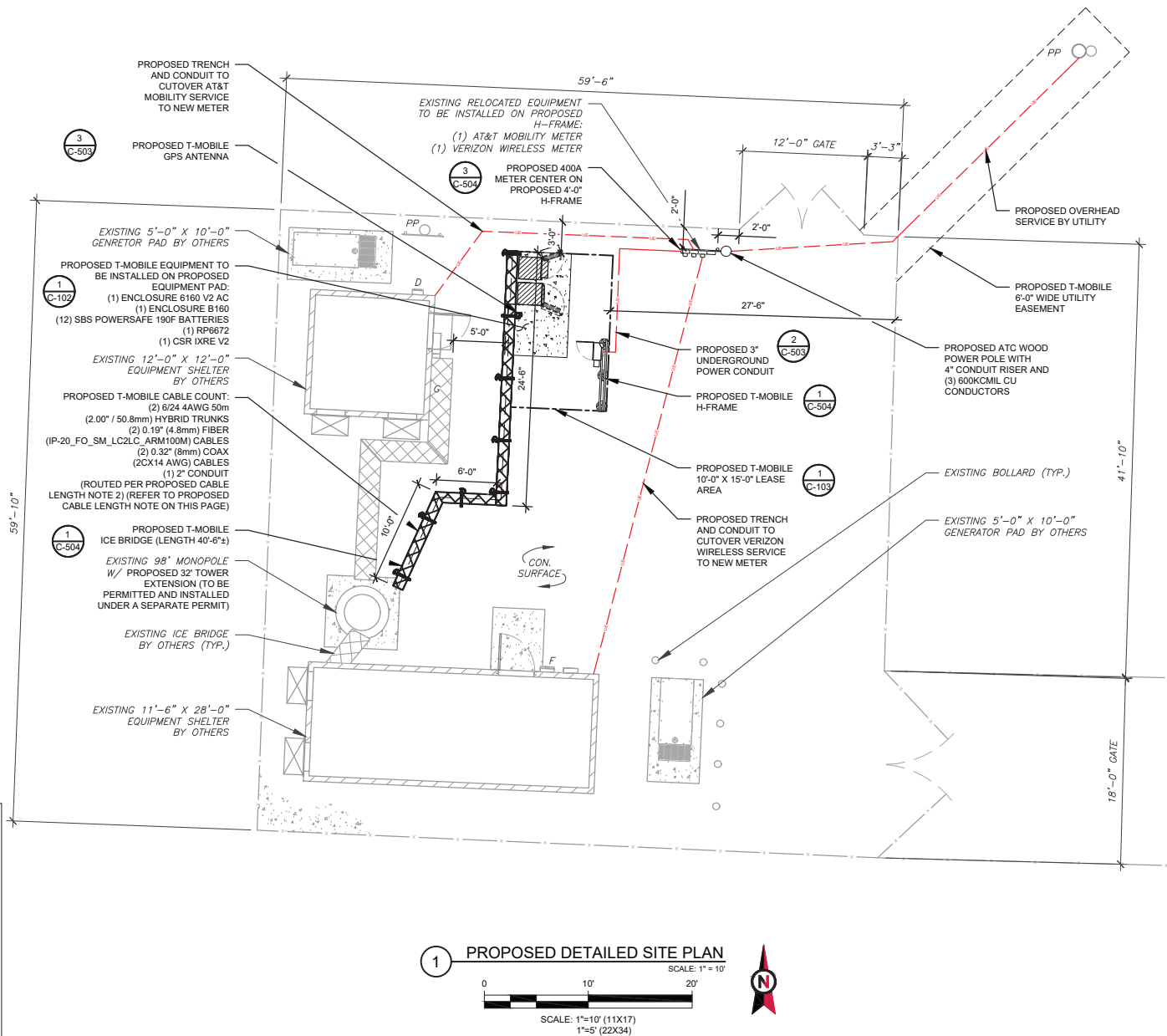
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- ICE BRIDGE, CABLE LADDER, COAX PORT, AND COAX CABLE ARE SHOWN FOR REFERENCE ONLY. CONTRACTOR SHALL CONFIRM THE EXACT LOCATION OF ALL PROPOSED AND EXISTING EQUIPMENT AND STRUCTURES DEPICTED ON THIS PLAN. BEFORE UTILIZING EXISTING CABLE SUPPORTS, COAX PORTS, INSTALLING NEW PORTS OR ANY OTHER EQUIPMENT, CONTRACTOR SHALL VERIFY ALL ASPECTS OF THE COMPONENTS MEET THE ATC SPECIFICATIONS.
- IT IS THE RESPONSIBILITY OF THE CONTRACTOR TO COORDINATE WITH THE T-MOBILE REPRESENTATIVE AND LOCAL UTILITY COMPANY FOR THE INSTALLATION OF CONDUITS, CONDUCTORS, BREAKERS, DISCONNECTS, OR ANY OTHER EQUIPMENT REQUIRED FOR ELECTRICAL SERVICE. ALL ELECTRICAL WORK SHALL BE PERFORMED IN ACCORDANCE WITH LATEST EDITION OF THE STATE AND NATIONAL CODES, ORDINANCES AND REGULATIONS APPLICABLE TO THIS PROJECT.

LEGEND

⊗	GROUNDING TEST WELL
ATS	AUTOMATIC TRANSFER SWITCH
B	BOLLARD
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E	ELECTRICAL
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K	KENTROX BOX
LC	LIGHTING CONTROL
M	METER
PB	PULL BOX
PP	POWER POLE
T	TELCO
TRN	TRANSFORMER
---	CHAINLINK FENCE

PROPOSED CABLE NOTES:

- ESTIMATED LENGTH OF PROPOSED CABLE IS **50m**. ESTIMATED LENGTH OF CABLE WAS PROVIDED BY CUSTOMER OR CALCULATED BY ADDING THE RAD CENTER AND THE DISTANCE FROM THE SHELTER ENTRY PLATE TO THE TOWER (ALONG THE ICE BRIDGE) AND A SAFETY FACTOR MEASUREMENT OF 15% (OF THE TWO PREVIOUS VALUES). CDS DEFER TO GREATEST CABLE LENGTH.
- ROUTE PROPOSED CABLES ALONG SAME PATH AS EXISTING CABLES AND IN ACCORDANCE WITH STRUCTURAL ANALYSIS. WHERE POSSIBLE UTILIZE EXISTING CABLE SUPPORT STRUCTURES AS PROVIDED FOR CARRIER TO ADEQUATELY SECURE CABLES. USING EITHER APPROPRIATELY SIZED STAINLESS STEEL SNAP-INS OR MOUNTING HARDWARE AND BRACKETS AS SPECIFIED BY CABLE MANUFACTURER. OTHERWISE, ATTACH CABLES TO HORIZONTAL OR DIAGONAL TOWER MEMBERS USING PROPOSED STAINLESS STEEL ADAPTERS (DO NOT ATTACH TO TOWER LEG).





PLANS PREPARED BY:



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5	100% CONSTRUCTION	BJO	05/06/26

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LICENSED PROFESSIONAL ENGINEER
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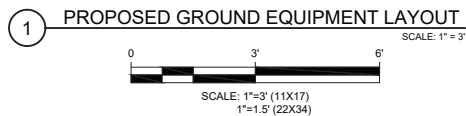
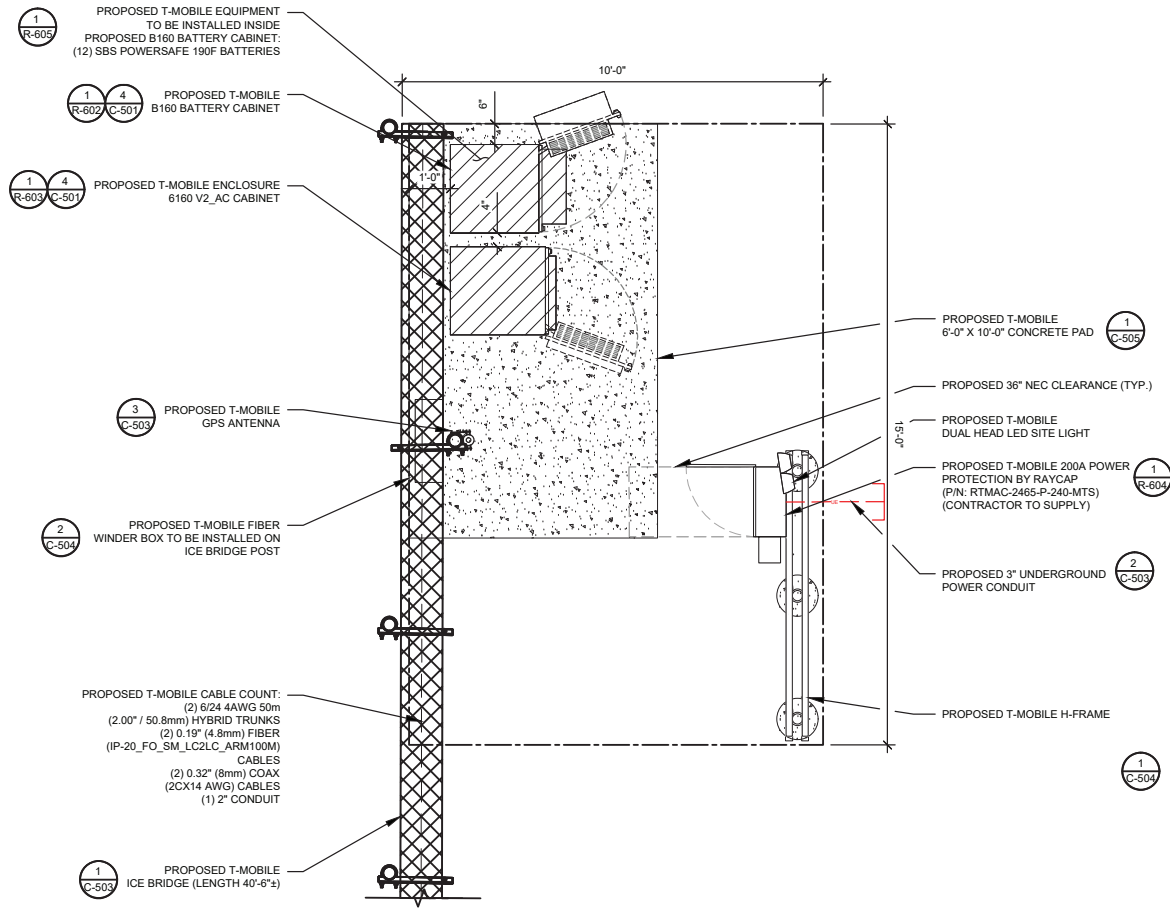
SEAL: 05/06/26

T-Mobile

DATE DRAWN:	05/06/26
ATC JOB NO:	15316616
CUSTOMER NAME:	ATC OAKDALE S CA
CUSTOMER ID:	SCL0224A

PROPOSED DETAILED SITE PLAN		
<table border="1" style="width: 100%;"> <tr> <td style="width: 50%;">SHEET NUMBER: C-102</td> <td style="width: 50%;">REVISION: 4</td> </tr> </table>	SHEET NUMBER: C-102	REVISION: 4
SHEET NUMBER: C-102	REVISION: 4	

NOTE:
ALL NEW AC POWER CONDUIT ABOVE GROUND TO BE RIDGE CONDUIT.



AMERICAN TOWER®

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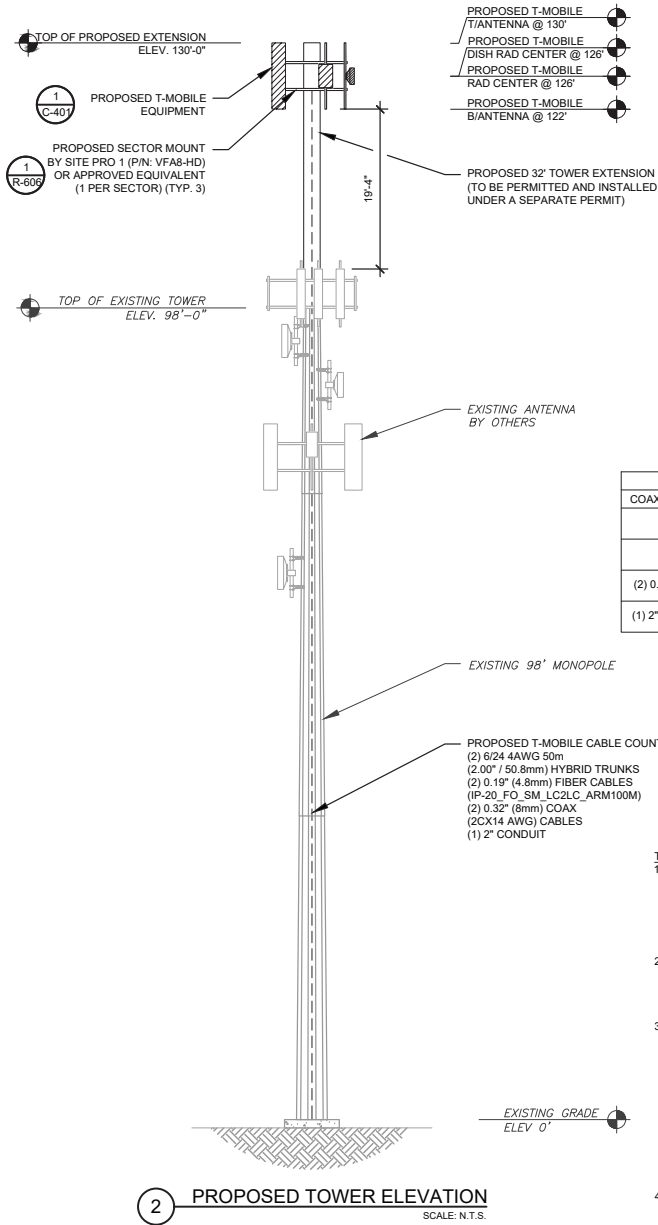
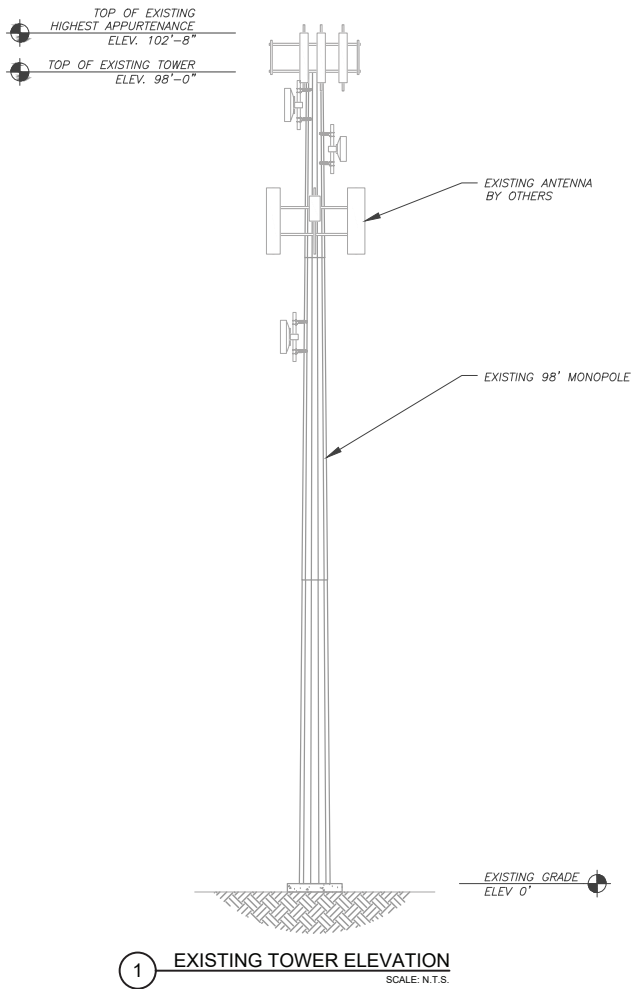
TEP OpCo, LLC

SEAL: 10/10/25

DATE DRAWN:	10/10/25
ATC JOB NO:	15316616
CUSTOMER NAME:	ATC OAKDALE S CA
CUSTOMER ID:	SCL0224A

DETAILED EQUIPMENT LAYOUT

SHEET NUMBER: C-103	REVISION: 2
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- PROPOSED T-MOBILE
T/ANTENNA @ 130'
PROPOSED T-MOBILE
DISH RAD CENTER @ 128'
PROPOSED T-MOBILE
RAD CENTER @ 126'
PROPOSED T-MOBILE
B/ANTENNA @ 122'

PER MOUNT ANALYSIS COMPLETED BY AMERICAN TOWER CORPORATION, DATED OCTOBER 6, 2025, THE PROPOSED MOUNT CAN ADEQUATELY SUPPORT THE PROPOSED LOADING.

NOTES:

- PLEASE MAKE SURE NO RUST ON COMPONENTS AND NO LOOSE CONNECTIONS. ENSURE THERE ARE NO PIM ISSUES DURING INSTALLATION.
- NO ANTENNA SHADOWING. ALL ANTENNAS ARE TO BE CO-PLANAR.
- RADIOS CANNOT TOUCH ANTENNAS.
- CALL OUT THE USE OF THE CONCEALFAB PIM SHIELD KIT.

PROPOSED CABLING SUMMARY		
COAX/CONDUIT	HYBRID/FIBER	STATUS
-	(2) 6/24 4AWG 50m (2.00" / 50.8mm)	ADD
-	(2) 0.19" (4.8mm)	ADD
(2) 0.32" (8mm)	-	ADD
(1) 2" CONDUIT	-	ADD

TOWER NOTES:

- IT IS THE CONTRACTOR'S RESPONSIBILITY TO CONFIRM WITH THE PROJECT MANAGER THAT THEY HAVE THE MOST RECENT VERSION OF THE STRUCTURAL ANALYSIS BEFORE COMMENCING WORK. EXISTING AND PROPOSED TOWER APPURTENANCES, MOUNTS, AND ANTENNAS ARE SHOWN BASED ON THE STRUCTURAL ANALYSIS.
- WHERE APPLICABLE, ALL NEW ANTENNAS, EQUIPMENT, MOUNTS, CABLING, ETC. SHALL BE PAINTED/SOCKED TO MATCH EXISTING EQUIPMENT IN ACCORDANCE WITH FAA, JURISDICTION, AND/OR OTHER LOCAL REQUIREMENTS.
- ROUTE PROPOSED CABLES ALONG SAME PATH AS EXISTING CABLES AND IN ACCORDANCE WITH STRUCTURAL ANALYSIS. IF ADEQUATE SPACE EXISTS, ROUTE CABLES THROUGH ENTRY PORT HOLE, UP INSIDE OF MONOPOLE, AND THROUGH EXIT PORT HOLE. IF ROUTING OUTSIDE THE MONOPOLE, ATTACH CABLES USING STAND-OFF ADAPTERS MOUNTED TO TOWER USING STAINLESS STEEL BANDING. ADEQUATELY SECURE CABLES USING EITHER APPROPRIATELY SIZED STAINLESS STEEL SNAP-INS OR MOUNTING HARDWARE AND BRACKETS AS SPECIFIED BY CABLE MANUFACTURER.
- TOWER ELEVATION DEPICTION MAY NOT REFLECT ALL EQUIPMENT INCLUDED IN STRUCTURAL ANALYSIS. REFER TO STRUCTURAL ANALYSIS FOR FULL TOWER LOADING.



AMERICAN TOWER

PLANS PREPARED BY:



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△	100% CONSTRUCTION	REW	10/10/25
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ATC SITE NUMBER:
82606

ATC SITE NAME:
OAKDALE SOUTH CA

T-MOBILE SITE NAME:
ATC OAKDALE SOUTH CA

SITE ADDRESS:
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TEP OpCo, LLC



SEAL: 05/06/26



DATE DRAWN:	05/06/26
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CUSTOMER ID:	SCL0224A

TOWER ELEVATION

SHEET NUMBER: C-201	REVISION: 4
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Project Summary
T-Mobile Proposed Modification to Existing Wireless Telecommunications Facility
SCL0224A – 6155 Bentley Road, Oakdale, CA 95361; APN: 063-030-004
Project Description

This project is an “Eligible Facilities Request” to review the proposed modification of the above referenced wireless facility and to determine that the proposal conforms to Section 6409(a) of the Middle Class Tax Relief and Job Creation Act of 2012, codified as 47 U.S.C. § 1455(a) (“Section 6409(a)”). Generally, Section 6409(a) requires that local governments “may not deny, and shall approve,” certain requests to collocate with or modify an existing wireless tower or base station so long as that request will not “substantially change the physical dimensions”.

The facility is located at 6155 Bentley Road, Oakdale, CA 95361; APN: 063-030-004, and consists of an existing 98’ Monopole located within an existing 3,600 square foot fenced compound. There are multiple other carriers located on the existing tower, with their ground equipment at grade within the existing compound.

T-Mobile is proposing to install a new 33’ tower extension, (6) new panel antennas, (6) new RRUs, and (1) new Microwave Dish w/ (2) new Radios on new mounts on existing tower. T-Mobile is also proposing to install a new concrete pad with (2) new equipment cabinets and new utilities located at grade. There will be no increase to ~~the height of the existing tower or~~ the footprint of the existing equipment area.

Though the proposed tower extension is 33’, the separation between the top of the existing carrier’s antennas, and the bottom of T-Mobile’s proposed antennas, does not exceed the 20’ allowed for as an “Eligible Facilities Request”. Therefore, this application must approved ministerially and within 60 days from receipt of application.

The below Equipment Schedule reflects the T-Mobile equipment proposed.

Equipment Type	Existing/Proposed	Number	Location
Antenna	Proposed	9	See Plans (Sheets C-201/401)
RRUs	Proposed	6	See Plans (Sheets C-201/401)
Microwave Dish	Proposed	3	See Plans (Sheets C-201/401)
ODU	Proposed	3	See Plans (Sheets C-201/401)
Equipment Cabinets	Proposed	1	See Plans (Sheet C-101)

Project Purpose

The purpose of this project is to upgrade T-Mobile’s existing wireless network, providing increased coverage and capacity. This will increase the network bandwidth and will allow for faster broadband connection speeds for local consumers such as public works, emergency responders, local businesses, residents, and visitors of Stanislaus County.

Justification Statement

This section will describe how the proposed use is substantially compatible with uses permitted in the same general area, how the proposed use would not be materially detrimental to other properties within the same area, and how the proposed installation will be compliant with federal regulations concerning the modification of existing facilities.

The proposed modifications to the existing facility are compatible with uses permitted in the same general area. This can be evidenced by the fact that as this proposal is for a modification to an already permitted wireless communication facility, this use has already been approved and established at this location and would not be materially detrimental to other properties within the same area.

Section 6409 of the Middle Class Tax Relief and Job Creation Act of 2012, which was signed into law February 22, 2012, mandates that state and local governments provide a nondiscretionary approval of an eligible facilities request for the modification of an existing wireless tower or base station that does not substantially change the physical dimensions of such tower or base station. The FCC defines substantial change as the mounting of a proposed antenna that would increase the existing height of the tower by more than 10%. T-Mobile's proposed modifications fall within the scope of this statute. For further clarification on Section 6409 of the Middle Class Tax Relief and Job Creation Act of 2012, please review the attached explanatory document included with this submittal, which includes links to all necessary materials.

Conclusion

As evidenced by the text above and the supporting documents provided as part of this application, the proposed modifications are in compliance with the existing approvals for this facility, Federal regulations concerning the modification of an existing wireless communication facility, and FCC Rules and Regulations concerning RF Emissions.

I would like to thank you for your time and efforts in reviewing this application and look forward to any feedback you may have.

Sincerely,

Tanner Young
On behalf of T-Mobile and American Tower
22431 Antonio Parkway
Suite B160-234
Rancho Santa Margarita, CA 92688
(714)493-9935
tyoung@dernagrp.com

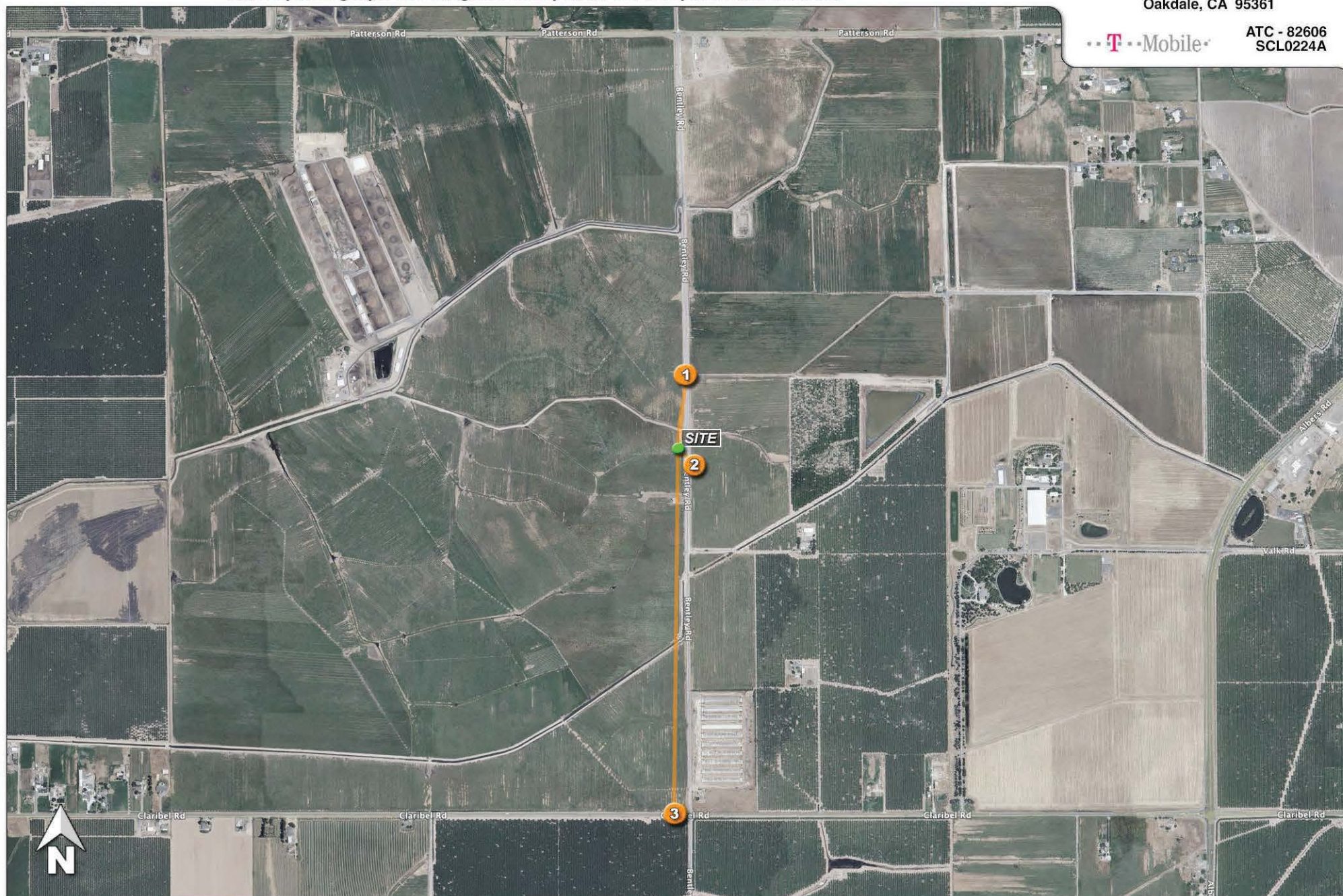
Aerial photograph showing the viewpoints for the photosimulations.

Oakdale South

6155 Bentley Rd
Oakdale, CA 95361

..T..Mobile

ATC - 82606
SCL0224A



1

Existing monopole to remain

Existing

Photosimulation of the view looking south along Bently Road, a typical viewpoint.

Oakdale South

6155 Bentley Rd
Oakdale, CA 95361

..T..Mobile

ATC - 82606
SCL0224A

Proposed antennas

Proposed

Photosimulation of the view looking northwest from directly across Bentley Road.

2

Existing monopole to remain

Proposed antennas

Existing

Oakdale South

6155 Bentley Rd
Oakdale, CA 95361

••T••Mobile•

ATC - 82606
SCL0224A

Proposed

3

Existing monopole to remain

Existing

Photosimulation of the view looking due north from the nearest point along Claribel Road.

Oakdale South

6155 Bentley Rd
Oakdale, CA 95361

..T..Mobile

ATC - 82606
SCL0224A

Proposed antennas

Proposed

**The Derna Group, LLC on behalf of
T-Mobile**

Site ID – SCL0224A_ATC #82606

Assessment Purpose – TMO Mod

Site Name – SCL0224A

Site Compliance Report

**6155 Bentley Road
Oakdale, CA 95361**

Latitude: N37-43-11.28

Longitude: W120-52-1.92

Structure Type: Monopole

Report generated date: May 8, 2026

Report by: John Lee

Customer Contact: Tanner Young

**T-Mobile is compliant with the FCC Rules and
Regulations, as described in OET Bulletin 65.**

The Derna Group, LLC on behalf of T-Mobile
SCL0224A - SCL0224A_ATC #82606
Radio Frequency (RF) Site Compliance Report



6155 Bentley Road, Oakdale, CA 95361



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1 Information

Original Report Date:	May 8, 2026
Total Report Revisions:	N/A
Report Revision Date:	N/A
Software Used:	RFMaster, Version 1.0096.38
Calculation Methodology:	Sula09
DOCUMENTS USED:	CD: T-MOBILE, SCL0224A, ATC 82606 (15316616) AE(CD).Rev4 Structural Analysis: STAMPED PDF. T-MOBILE @ 82606 OAKDALE SOUTH CA, CA (15316616_C3_10). Structural Analysis (64.20_). Pass - Pending Extension
POWERS USED:	Max RRH Powers
EME SIGNAGE VISIT REQUIRED	No
IMPLEMENT RF SAFETY PLAN PROCESS WITH LANDLORD	No
Compliance Statement:	T-Mobile is compliant with the FCC Rules and Regulations, as described in OET Bulletin 65.



2 Actions for Site Compliance:

Based on common industry practice and our understanding of FCC and OSHA requirements, this section provides a statement of recommendations for site compliance. If required, RF alert signage recommendations have been proposed based on theoretical analysis of MPE levels.

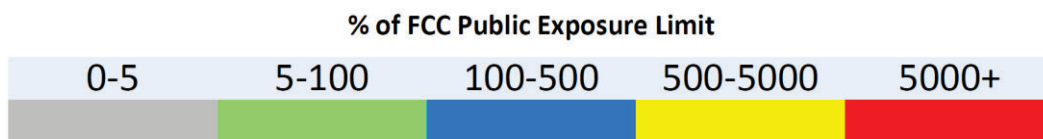
T-Mobile is compliant with the FCC Rules and Regulations, as described in OET Bulletin 65.

Note: For Overall Compliance, access to the site (i.e., access road(s), gate(s), climbing point(s), etc.) must remain locked/restricted.

3 RF Exposure Diagram

The RF diagram(s) below display theoretical percentage of the Maximum Permissible Exposure for all systems at the site. These diagrams use modeling as prescribed in OET Bulletin 65 and assumptions detailed in Appendix B.

The key at the bottom of each diagram indicates if percentages displayed are referenced to FCC **General Public** Maximum Permissible Exposure (MPE) limits. Color coding on the diagram is as follows:



This table displays the maximum theoretical percentage of the FCC's General Public MPE limits:

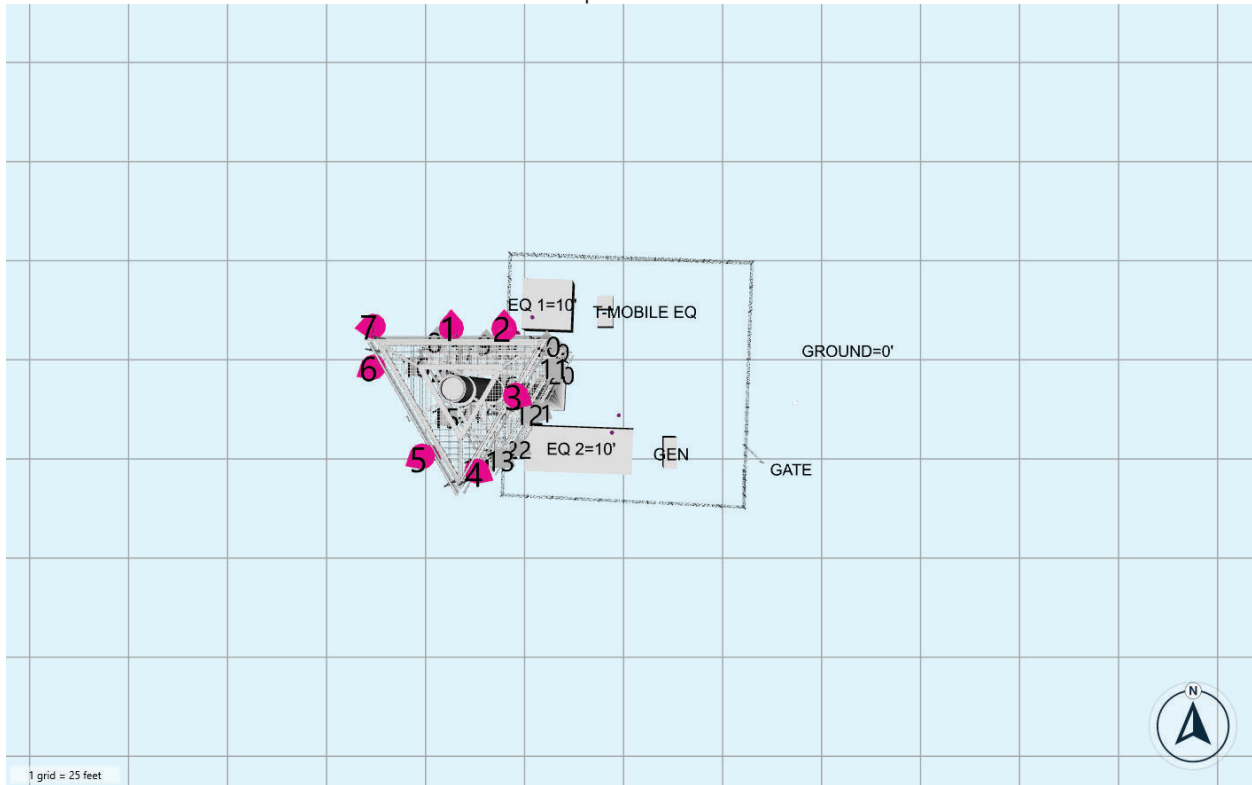
	General Public Levels:	
Exposure Type:	Spatial Average	Spatial Average
Reference Level:	EQ 2=10'	Ground
T-Mobile Contribution:	0.11%	0.10%
Composite:	0.33%	0.30%

In the RF exposure simulations below, all heights are reflected with respect to the main site level. In most rooftop cases, this is the height of the main rooftop, and in other cases, this may be ground level. Each different area, rooftop, or platform level is labeled with its height relative to the main site level. Exposure is calculated appropriately based on the relative height and location of that area to all antennas. The analyzed elevations in the RF exposure simulations are as follows:

- GROUND=0'
- EQ 1=10'
- EQ 2=10'

RF Exposure Analysis for: SCL0224A

Composite View



Legend

Study Zone	Elev. (ft)	Type	Exposure Profile	Max MPE	Att	Carriers
EQ 1=10'	10.0	Floor	2D Sula9 GP 1.0 res	0.32%	0.00	UNKNOWN, TMO
EQ 2=10'	10.0	Floor	2D Sula9 GP 1.0 res	0.33%	0.00	UNKNOWN, TMO
GROUND=0'	0.1	Floor	2D Sula9 GP 5.0 res	0.30%	0.00	UNKNOWN, TMO

5%-100%	100%-500%	500%-5000%	5000%+
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Exposure Profile Name	Model	Exposure Area	Standard	Resolution	RCF
2D Sula9 GP 1.0 res	Sula 9	Spatial Avg. (6 ft)	FCC General Public	1.0	1.0
2D Sula9 GP 5.0 res	Sula 9	Spatial Avg. (6 ft)	FCC General Public	5.0	1.0

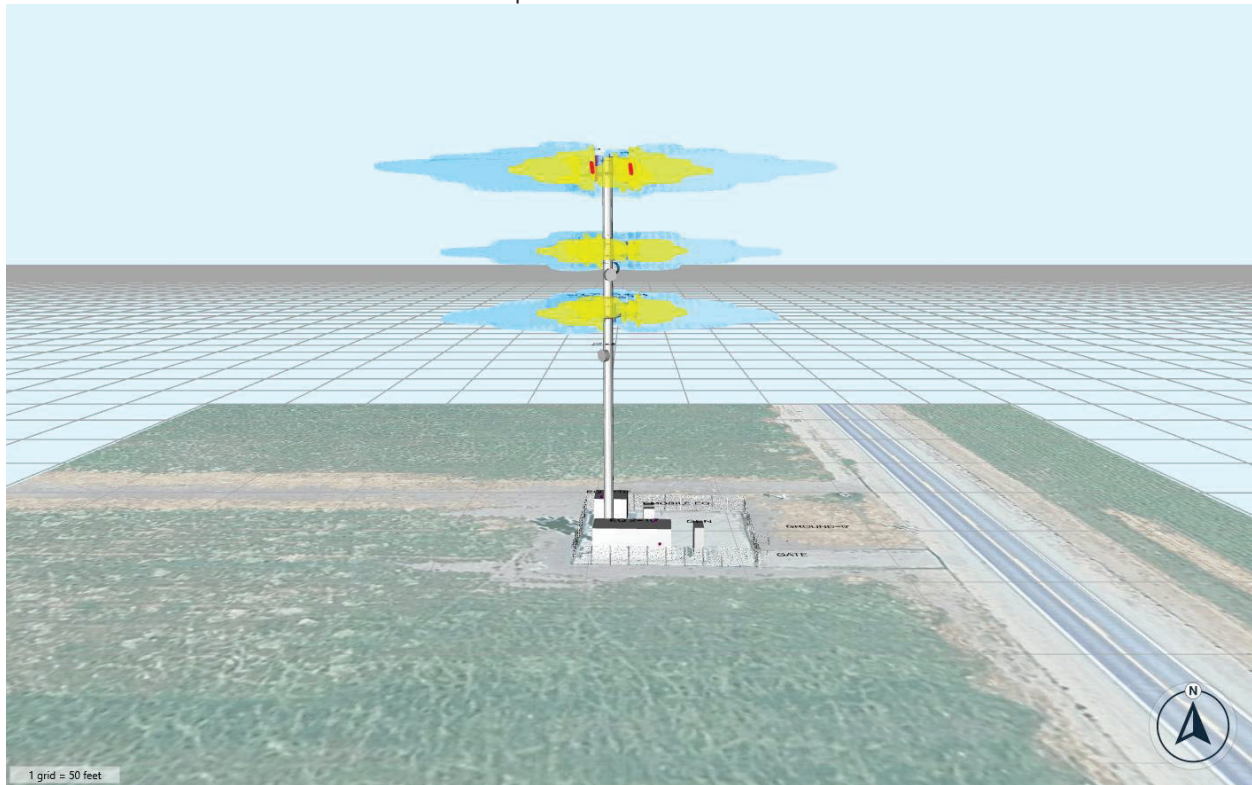
● TMO	● UNKNOWN
● Max MPE	

Grid Size: 25.00 feet

Floor = Elevation +6' | Mid-Level = Elevation +/- 3'

RF Exposure Analysis for: SCL0224A

Composite Elevation View



Legend

Study Zone	Elev. (ft)	Type	Exposure Profile	Max MPE	Att	Carriers
ANTENNA LEVEL	60.0 - 140.0	3D Area	3D Sula9 GP 5.0 res	6723.04%	0.00	UNKNOWN, TMO
100%-500%	500%-5000%	5000%+				
Study Zone	Elev. (ft)	Type	Exposure Profile	Max MPE	Att	Carriers
EQ 1=10'	10.0	Floor	2D Sula9 GP 1.0 res	0.32%	0.00	UNKNOWN, TMO
EQ 2=10'	10.0	Floor	2D Sula9 GP 1.0 res	0.33%	0.00	UNKNOWN, TMO
GROUND=0'	0.1	Floor	2D Sula9 GP 5.0 res	0.30%	0.00	UNKNOWN, TMO
5%-100%	100%-500%	500%-5000%	5000%+			
Exposure Profile Name	Model	Exposure Area	Standard	Resolution	RCF	
2D Sula9 GP 1.0 res	Sula 9	Spatial Avg. (6 ft)	FCC General Public	1.0	1.0	
2D Sula9 GP 5.0 res	Sula 9	Spatial Avg. (6 ft)	FCC General Public	5.0	1.0	
3D Sula9 GP 5.0 res	Sula 9	Spatial Avg. (6 ft)	FCC General Public	5.0	1.0	

● TMO

● UNKNOWN

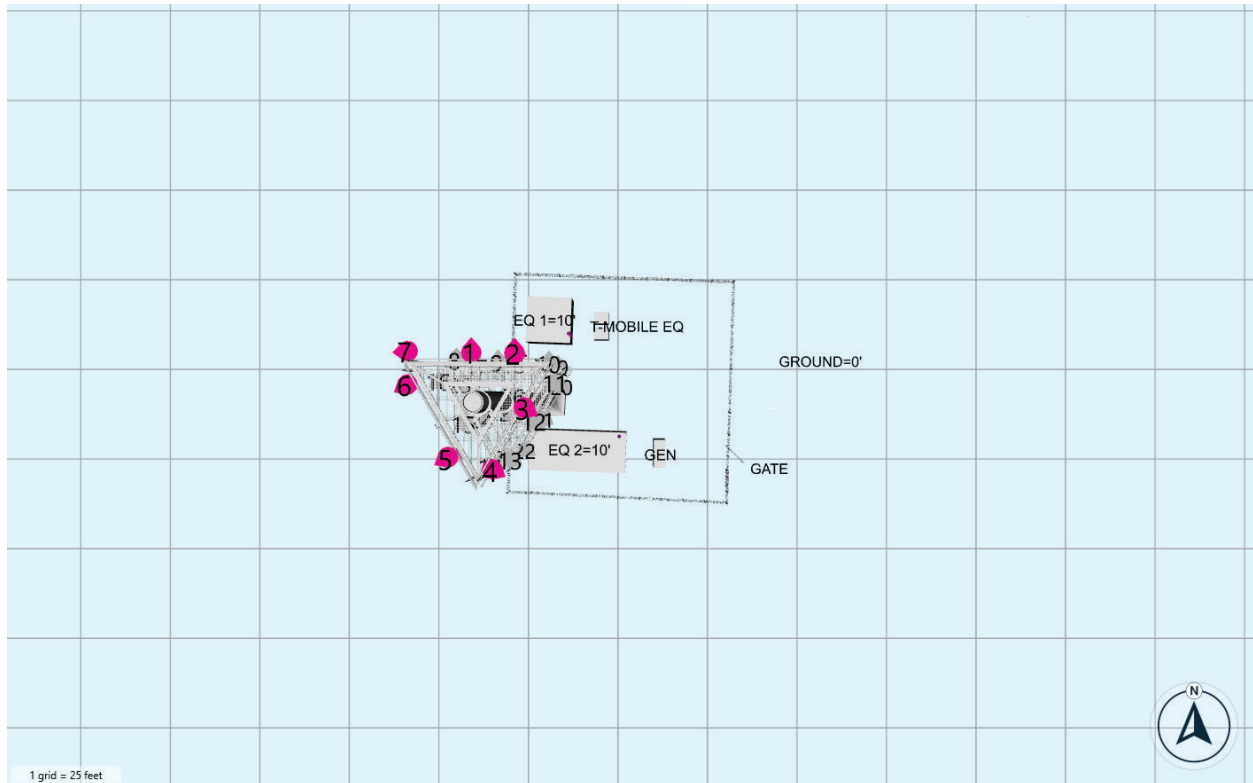
● Max MPE

Grid Size: 50.00 feet

Floor = Elevation +6' | Mid-Level = Elevation +/- 3'

RF Exposure Analysis for: SCL0224A

T-Mobile Contribution View



Legend

Study Zone	Elev. (ft)	Type	Exposure Profile	Max MPE	Att	Carriers
EQ 1=10'	10.0	Floor	2D Sula9 GP 1.0 res	0.12%	0.00	UNKNOWN, TMO
EQ 2=10'	10.0	Floor	2D Sula9 GP 1.0 res	0.11%	0.00	UNKNOWN, TMO
GROUND=0'	0.1	Floor	2D Sula9 GP 5.0 res	0.10%	0.00	UNKNOWN, TMO

5%-100%	100%-500%	500%-5000%	5000%+
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Exposure Profile Name	Model	Exposure Area	Standard	Resolution	RCF
2D Sula9 GP 1.0 res	Sula 9	Spatial Avg. (6 ft)	FCC General Public	1.0	1.0
2D Sula9 GP 5.0 res	Sula 9	Spatial Avg. (6 ft)	FCC General Public	5.0	1.0

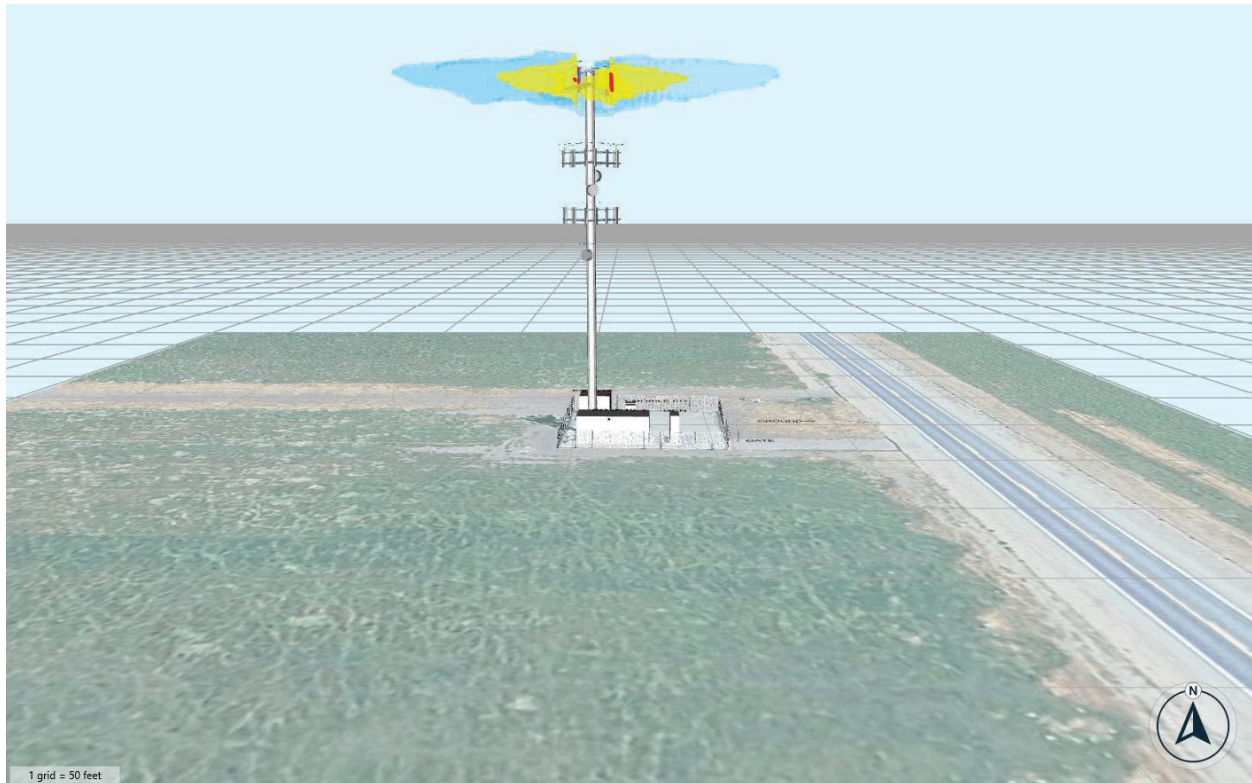
● TMO
 ● Max MPE
 ● UNKNOWN

Grid Size: 25.00 feet

Floor = Elevation +6' | Mid-Level = Elevation +/- 3'

RF Exposure Analysis for: SCL0224A

T-Mobile Elevation View



Legend

Study Zone	Elev. (ft)	Type	Exposure Profile	Max MPE	Att	Carriers
ANTENNA LEVEL	106.0 - 146.0	3D Area	3D Sula9 GP 5.0 res	6722.96%	0.00	UNKNOWN, TMO
100%-500%		500%-5000%		5000%+		
Study Zone	Elev. (ft)	Type	Exposure Profile	Max MPE	Att	Carriers
EQ 1=10'	10.0	Floor	2D Sula9 GP 1.0 res	0.12%	0.00	UNKNOWN, TMO
EQ 2=10'	10.0	Floor	2D Sula9 GP 1.0 res	0.11%	0.00	UNKNOWN, TMO
GROUND=0'	0.1	Floor	2D Sula9 GP 5.0 res	0.10%	0.00	UNKNOWN, TMO
5%-100%		100%-500%		500%-5000%		
Exposure Profile Name	Model	Exposure Area		Standard	Resolution	RCF
2D Sula9 GP 1.0 res	Sula 9	Spatial Avg. (6 ft)		FCC General Public	1.0	1.0
2D Sula9 GP 5.0 res	Sula 9	Spatial Avg. (6 ft)		FCC General Public	5.0	1.0
3D Sula9 GP 5.0 res	Sula 9	Spatial Avg. (6 ft)		FCC General Public	5.0	1.0

● TMO

● UNKNOWN

● Max MPE

Grid Size: 50.00 feet

Floor = Elevation +6' | Mid-Level = Elevation +/- 3'

RF Exposure Analysis for: SCL0224A

T-Mobile Antenna Level View



Legend

Study Zone	Elev. (ft)	Type	Exposure Profile	Max MPE	Att	Carriers
ANTENNA LEVEL	106.0 - 146.0	3D Area	3D Sula9 GP 5.0 res	6722.96%	0.00	UNKNOWN, TMO

100%-500%	500%-5000%	5000%+
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Exposure Profile Name	Model	Exposure Area	Standard	Resolution	RCF
3D Sula9 GP 5.0 res	Sula 9	Spatial Avg. (6 ft)	FCC General Public	5.0	1.0

● TMO

● UNKNOWN

● Max MPE

Grid Size: 25.00 feet

Floor = Elevation +6' | Mid-Level = Elevation +/- 3'

4 Antenna Inventory

The following antenna inventory and representative photographs were obtained or verified during the site visit and were utilized to create the site model diagrams:

ANT ID	Operator	Antenna Make and Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Ant Gain (dBd)	Power	Power Type	Power Units	TX Count	Misc Loss	Total ERP (Watts)	Z (ft)	MDT (Deg)	EDT (Deg)
1	TMO	ERICSSON SON_AIR6419 NR MACRO 2500 TMO	Directional	2500	5G	0	63	2.7953	15.55	320	TPO	Watts	1	1.25	8612.92	126	0	6
1	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	600	5G	0	60	7.979	13.3	200	TPO	Watts	1	0.00	4275.93	126	0	2
2	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	700	LTE	0	63	7.979	13.93	200	TPO	Watts	1	0.00	4943.45	126	0	2
2	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	1900	5G	0	58	7.979	15.69	140	TPO	Watts	1	0.00	5189.55	126	0	2
2	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	1900	LTE	0	58	7.979	15.69	140	TPO	Watts	1	0.00	5189.55	126	0	2
2	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	2100	5G	0	60	7.979	16.66	280	TPO	Watts	1	0.00	12976.57	126	0	2
3	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	600	5G	120	60	7.979	13.3	200	TPO	Watts	1	0.00	4275.93	126	0	2
3	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	700	LTE	120	63	7.979	13.93	200	TPO	Watts	1	0.00	4943.45	126	0	2
3	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	1900	5G	120	58	7.979	15.69	140	TPO	Watts	1	0.00	5189.55	126	0	2
3	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	1900	LTE	120	58	7.979	15.69	140	TPO	Watts	1	0.00	5189.55	126	0	2
3	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	2100	5G	120	60	7.979	16.66	280	TPO	Watts	1	0.00	12976.57	126	0	2
4	TMO	ERICSSON SON_AIR6419 NR MACRO 2500 TMO	Directional	2500	5G	120	63	2.7953	15.55	320	TPO	Watts	1	1.25	8612.92	126	0	6
5	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	600	5G	240	60	7.979	13.3	200	TPO	Watts	1	0.00	4275.93	126	0	2
5	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	700	LTE	240	63	7.979	13.93	200	TPO	Watts	1	0.00	4943.45	126	0	2
5	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	1900	5G	240	58	7.979	15.69	140	TPO	Watts	1	0.00	5189.55	126	0	2



ANT ID	Operator	Antenna Make and Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Ant Gain (dBd)	Power	Power Type	Power Units	TX Count	Misc Loss	Total ERP (Watts)	Z (ft)	MDT (Deg)	EDT (Deg)
5	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	1900	LTE	240	58	7.979	15.69	140	TPO	Watts	1	0.00	5189.55	126	0	2
5	TMO	AMPHENOL APXVAALL24M-U-J20	Directional	2100	5G	240	60	7.979	16.66	280	TPO	Watts	1	0.00	12976.57	126	0	2
6	TMO	ERICSSON SON_AIR6419 NR MACRO 2500 TMO	Directional	2500	5G	240	63	2.7953	15.55	320	TPO	Watts	1	1.25	8612.92	126	0	6
7	TMO	ANDREW VHLP2-18	Microwave	18000		264.53	2.1	2	36.95	0.1	TPO	Watts	1	1.25	371.54	126	0	0
8	UNKNOWN	GENERIC PANEL 6FT	Directional	700	LTE	0	68	6	12.33	160	TPO	Watts	1	0.00	2736.02	100	0	0
8	UNKNOWN	GENERIC PANEL 6FT	Directional	2100	LTE	0	63	6	16.39	160	TPO	Watts	1	0.00	6968.19	100	0	0
9	UNKNOWN	GENERIC PANEL 6FT	Directional	850	LTE	0	66	6	12.62	160	TPO	Watts	1	0.00	2924.96	100	0	0
10	UNKNOWN	GENERIC PANEL 6FT	Directional	1900	LTE	0	66	6	15.84	160	TPO	Watts	1	0.00	6139.31	100	0	0
11	UNKNOWN	GENERIC PANEL 6FT	Directional	700	LTE	120	68	6	12.33	160	TPO	Watts	1	0.00	2736.02	100	0	0
11	UNKNOWN	GENERIC PANEL 6FT	Directional	2100	LTE	120	63	6	16.39	160	TPO	Watts	1	0.00	6968.19	100	0	0
12	UNKNOWN	GENERIC PANEL 6FT	Directional	850	LTE	120	66	6	12.62	160	TPO	Watts	1	0.00	2924.96	100	0	0
13	UNKNOWN	GENERIC PANEL 6FT	Directional	1900	LTE	120	66	6	15.84	160	TPO	Watts	1	0.00	6139.31	100	0	0
14	UNKNOWN	GENERIC PANEL 6FT	Directional	700	LTE	240	68	6	12.33	160	TPO	Watts	1	0.00	2736.02	100	0	0
14	UNKNOWN	GENERIC PANEL 6FT	Directional	2100	LTE	240	63	6	16.39	160	TPO	Watts	1	0.00	6968.19	100	0	0
15	UNKNOWN	GENERIC PANEL 6FT	Directional	850	LTE	240	66	6	12.62	160	TPO	Watts	1	0.00	2924.96	100	0	0
16	UNKNOWN	GENERIC PANEL 6FT	Directional	1900	LTE	240	66	6	15.84	160	TPO	Watts	1	0.00	6139.31	100	0	0
17	UNKNOWN	GENERIC PANEL 6FT	Directional	700	LTE	0	68	6	12.33	160	TPO	Watts	1	0.00	2736.02	80	0	0
17	UNKNOWN	GENERIC PANEL 6FT	Directional	2100	LTE	0	63	6	16.39	160	TPO	Watts	1	0.00	6968.19	80	0	0
18	UNKNOWN	GENERIC PANEL 6FT	Directional	850	LTE	0	66	6	12.62	160	TPO	Watts	1	0.00	2924.96	80	0	0
19	UNKNOWN	GENERIC PANEL 6FT	Directional	1900	LTE	0	66	6	15.84	160	TPO	Watts	1	0.00	6139.31	80	0	0
20	UNKNOWN	GENERIC PANEL 6FT	Directional	700	LTE	120	68	6	12.33	160	TPO	Watts	1	0.00	2736.02	80	0	0
20	UNKNOWN	GENERIC PANEL 6FT	Directional	2100	LTE	120	63	6	16.39	160	TPO	Watts	1	0.00	6968.19	80	0	0
21	UNKNOWN	GENERIC PANEL 6FT	Directional	850	LTE	120	66	6	12.62	160	TPO	Watts	1	0.00	2924.96	80	0	0
22	UNKNOWN	GENERIC PANEL 6FT	Directional	1900	LTE	120	66	6	15.84	160	TPO	Watts	1	0.00	6139.31	80	0	0



ANT ID	Operator	Antenna Make and Model	Type	TX Freq (MHz)	Technology	Az (Deg)	Hor BW (Deg)	Ant Len (ft)	Ant Gain (dBd)	Power	Power Type	Power Units	TX Count	Misc Loss	Total ERP (Watts)	Z (ft)	MDT (Deg)	EDT (Deg)
23	UNKNOWN	GENERIC PANEL 6FT	Directional	700	LTE	240	68	6	12.33	160	TPO	Watts	1	0.00	2736.02	80	0	0
23	UNKNOWN	GENERIC PANEL 6FT	Directional	2100	LTE	240	63	6	16.39	160	TPO	Watts	1	0.00	6968.19	80	0	0
24	UNKNOWN	GENERIC PANEL 6FT	Directional	850	LTE	240	66	6	12.62	160	TPO	Watts	1	0.00	2924.96	80	0	0
25	UNKNOWN	GENERIC PANEL 6FT	Directional	1900	LTE	240	66	6	15.84	160	TPO	Watts	1	0.00	6139.31	80	0	0
26	UNKNOWN	GENERIC MICROWAVE 4FT	Microwave	11000		26	1.5	3.9993	38.65	0.1	TPO	Watts	1	0.00	732.82	94	0	0
27	UNKNOWN	GENERIC MICROWAVE 4FT	Microwave	11000		160	1.5	3.9993	38.65	0.1	TPO	Watts	1	0.00	732.82	92	0	0
28	UNKNOWN	GENERIC MICROWAVE 4FT	Microwave	11000		227	1.5	3.9993	38.65	0.1	TPO	Watts	1	0.00	732.82	65	0	0

Note: The Z reference indicates antenna height above the ground level (AGL). ERP values provided by the client and used in the modeling may be greater than are currently deployed. For additional modeling information, refer to Appendix B. Proposed equipment is tagged as (Proposed) under Operator or Antenna Make and Model.

T-Mobile uses 75% Duty Cycle reflected as a Misc Loss of 1.25dB for the EME power calculations for TDD (Time Division Duplex) antennas with integrated radio systems(mmWave and 2500Mhz bands). The "Total power (Watt)" will reflect a 100% Duty Cycle value, and the "ERP (Watt)" column will reflect the 75% Duty Cycle value. RF Exposure Simulations and mitigations are reflective of the 75% Duty Cycle.



5 Reviewer Certification

The reviewer whose signature appears below hereby certifies and affirms:

That I am an employee of InfraServices Group Wireless LLC at which the staff and I provide RF compliance services to clients in the wireless communications industry; and

That I am thoroughly familiar with the Rules and Regulations of the Federal Communications Commission (FCC) as well as the regulations of the Occupational Safety and Health Administration (OSHA), both in general and specifically as they apply to the FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields; and

That I have thoroughly reviewed this Site Compliance Report and believe it to be true and accurate to the best of my knowledge as assembled by and attested to by John Lee.

May 8, 2026

Mahmoud Eid Mahmoud Eid



Appendix A – Statement of Limiting Conditions

Sitesafe™ will not be responsible for matters of a legal nature that affect the site or property.

Due to the complexity of some wireless sites, Sitesafe™ performed this analysis and created this report utilizing best industry practices and due diligence. Sitesafe™ cannot be held accountable or responsible for anomalies or discrepancies due to actual site conditions (i.e., mislabeling of antennas or equipment, inaccessible cable runs, inaccessible antennas or equipment, etc.) or information or data supplied by The Derna Group, LLC, the site manager, or their affiliates, subcontractors or assigns.

Sitesafe™ has provided computer generated model(s) in this Site Compliance Report to show approximate dimensions of the site, and the model is included to assist the reader of the compliance report to visualize the site area, and to provide supporting documentation for Sitesafe™'s recommendations.

Sitesafe™ may note in the Site Compliance Report any adverse physical conditions, such as needed repairs, observed during the survey of the subject property or that Sitesafe™ became aware of during the normal research involved in performing this survey. Sitesafe™ will not be responsible for any such conditions that do exist or for any engineering or testing that might be required to discover whether such conditions exist. Because Sitesafe™ is not an expert in the field of mechanical engineering or building maintenance, the Site Compliance Report must not be considered a structural or physical engineering report.

Sitesafe™ obtained information used in this Site Compliance Report from sources that Sitesafe™ considers reliable and believes them to be true and correct. Sitesafe™ does not assume any responsibility for the accuracy of such items that were furnished by other parties. When conflicts in information occur between data provided by a second party and physical data collected by Sitesafe™, the physical data will be used.



Appendix B – Assumptions and Definitions

General Model Assumptions

In this site compliance report, it is assumed that all antennas are operating at **full power at all times**. Software modeling was performed for all transmitting antennas located on the site. Sitesafe™ has further assumed a 100% duty cycle and maximum radiated power unless otherwise specified.

The site has been modeled with these assumptions to show the maximum RF energy density. Sitesafe™ believes this to be a worst-case analysis, based on best available data. Areas modeled to predict exposure greater than 100% of the applicable MPE level may not actually occur but are shown as a worst-case prediction that could be realized real time. Sitesafe™ believes these areas to be safe for entry by occupationally trained personnel utilizing appropriate personal protective equipment (in most cases, a personal monitor).

Thus, at any time, if power density measurements were made, we believe the real-time measurements would indicate levels below those depicted in the RF exposure diagram(s) in this report. By modeling in this way, Sitesafe™ has conservatively shown exclusion areas – areas that should not be entered without the use of a personal monitor, carriers reducing power, or performing real-time measurements to indicate real-time exposure levels.

Use of Generic Antennas

For the purposes of this report, the use of “Generic” as an antenna model, or “Unknown” for an operator means the information about a carrier, their FCC license and/or antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe™ will use our industry specific knowledge of equipment, antenna models, and transmit power to model the site. If more specific information can be obtained for the unknown measurement criteria, Sitesafe™ recommends remodeling of the site utilizing the more complete and accurate data. Information about similar facilities is used when the service is identified and associated with a particular antenna. If no information is available regarding the transmitting service associated with an unidentified antenna, using the antenna manufacturer’s published data regarding the antenna’s physical characteristics makes more conservative assumptions.

Where the frequency is unknown, Sitesafe™ uses the closest frequency in the antenna’s range that corresponds to the highest MPE, resulting in a conservative analysis.

Definitions

5% Rule – The rules adopted by the FCC specify that, in general, at multiple transmitter sites actions necessary to bring the area into compliance with the guidelines are the shared responsibility of all licensees whose transmitters produce field strengths or power density levels at the area in question in excess of 5% of the exposure limits. In other words, any wireless operator that contributes 5% or greater of the MPE limit in an area that is identified to be greater than 100% of the MPE limit is responsible for taking corrective actions to bring the site into compliance.

Compliance – The determination of whether a site complies with FCC standards with regards to Human Exposure to Radio Frequency Electromagnetic Fields from transmitting antennas.

Decibel (dB) – A unit for measuring power or strength of a signal.

Duty Cycle – The percent of pulse duration to the pulse period of a periodic pulse train. Also, may be a measure of the temporal transmission characteristic of an intermittently transmitting RF source such as a paging antenna by dividing average transmission duration by the average period for transmission. A duty cycle of 100% corresponds to continuous operation.

Effective (or Equivalent) Isotropic Radiated Power (EIRP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to an isotropic antenna.

Effective Radiated Power (ERP) – The product of the power supplied to the antenna and the antenna gain in a given direction relative to a half-wave dipole antenna.

Gain (of an antenna) – The ratio, usually expressed in decibels, of the power required at the input of a loss-free reference antenna to the power supplied to the input of the given antenna to produce, in a given direction, the same field strength or the same power density at the same distance. When not specified otherwise, the gain refers to the direction of maximum radiation. Gain may be considered for a specified polarization. Gain may be referenced to an isotropic antenna (dBi) or a half-wave dipole (dBd) antenna.

General Population/Uncontrolled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are *unaware* of the potential for exposure and who have no control over their exposure. General Population is also referenced as General Public.

Generic Antenna – For the purposes of this report, the use of “Generic” as an antenna model means the antenna information was not provided and could not be obtained while on site. In the event of unknown information, Sitesafe™ will use its industry specific knowledge of antenna models to select a worst-case scenario antenna to model the site.

Isotropic Antenna – An antenna that is completely non-directional. In other words, an antenna that radiates energy equally in all directions.



Maximum Measurement – This measurement represents the single largest measurement recorded when performing a spatial average measurement.

Maximum Permissible Exposure (MPE) – The rms and peak electric and magnetic field strength, their squares, or the plane-wave equivalent power densities associated with these fields to which a person may be exposed without harmful effect and with acceptable safety factor.

Occupational/Controlled Environment – Defined by the FCC as an area where RF exposure may occur to persons who are **aware** of the potential for exposure as a condition of employment or specific activity and can exercise control over their exposure.

OET Bulletin 65 – Technical guideline developed by the FCC's Office of Engineering and Technology to determine the impact of RF exposure on humans. The guideline was published in August 1997.

OSHA (Occupational Safety and Health Administration) – Under the Occupational Safety and Health Act of 1970, employers are responsible for providing a safe and healthy workplace for their employees. OSHA's role is to promote the safety and health of America's working men and women by setting and enforcing standards; providing training, outreach and education; establishing partnerships; and encouraging continual process improvement in workplace safety and health. For more information, visit www.osha.gov.

Radio Frequency Exposure or Electromagnetic Fields – Electromagnetic waves that are propagated from antennas through space.

Spatial Average Measurement – A technique used to average a minimum of ten (10) measurements taken in a ten (10) second interval from zero (0) to six (6) feet. This measurement is intended to model the average energy a 6-foot tall human body will absorb while present in an electromagnetic field of energy.

Transmitter Power Output (TPO) – The radio frequency output power of a transmitter's final radio frequency stage as measured at the output terminal while connected to a load.



Appendix C – Rules & Regulations

Explanation of Applicable Rules and Regulations

The FCC has set forth guidelines in OET Bulletin 65 for human exposure to radio frequency electromagnetic fields. Specific regulations regarding this topic are listed in Part 1, Subpart I, of Title 47 in the Code of Federal Regulations. Currently, there are two different levels of MPE - General Public MPE and Occupational MPE. An individual classified as Occupational can be defined as an individual who has received appropriate RF training and meets the conditions outlined below. General Public is defined as anyone who does not meet the conditions of being Occupational. FCC and OSHA Rules and Regulations define compliance in terms of total exposure to total RF energy, regardless of location of or proximity to the sources of energy.

It is the responsibility of all licensees to ensure these guidelines are maintained at all times. It is the ongoing responsibility of all licensees composing the site to maintain ongoing compliance with FCC rules and regulations. Individual licensees that contribute less than 5% MPE to any total area out of compliance are not responsible for corrective actions.

OSHA has adopted and enforces the FCC's exposure guidelines. A building owner or site manager can use this report as part of an overall RF Health and Safety Policy. It is important for building owners/site managers to identify areas in excess of the General Population MPE and ensure that only persons qualified as Occupational are granted access to those areas.

Occupational Environment Explained

The FCC definition of Occupational exposure limits apply to persons who:

- are exposed to RF energy as a consequence of their employment;
- have been made aware of the possibility of exposure; and
- can exercise control over their exposure.

OSHA guidelines go further to state that persons must complete RF Safety Awareness training and must be trained in the use of appropriate personal protective equipment.

In order to consider this site an Occupational Environment, the site must be controlled to prevent access by any individuals classified as the General Public. Compliance is also maintained when any non-occupational individuals (the General Public) are prevented from accessing areas indicated as Red or Yellow in the attached RF exposure diagram. In addition, a person must be aware of the RF environment into which they are entering. This can be accomplished by an RF Safety Awareness class, and by appropriate written documentation such as this Site Compliance Report.

All T-Mobile employees who require access to this site must complete RF Safety Awareness training and must be trained in the use of appropriate personal protective equipment.

Appendix D – General Safety Recommendations

The following are *general recommendations* appropriate for any site with accessible areas in excess of 100% General Public MPE. These recommendations are not specific to this site. These are safety recommendations appropriate for typical site management, building management, and other tenant operations.

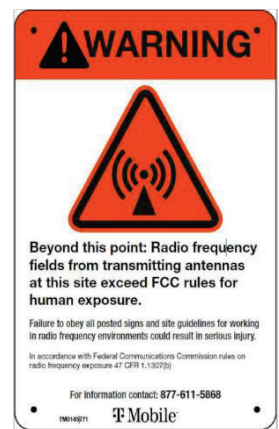
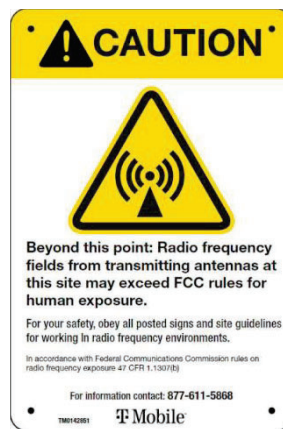
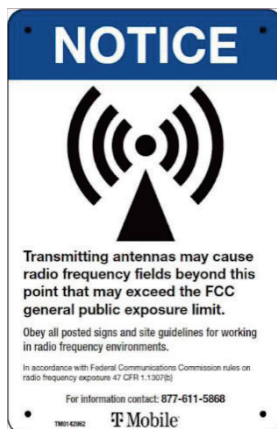
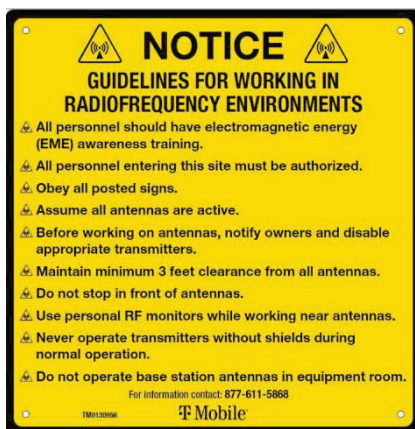
1. All individuals needing access to the main site (or the area indicated to be in excess of General Public MPE) should wear a personal protective monitor (PPM), successfully complete proper RF Safety Awareness training, and have and be trained in the use of appropriate personal protective equipment.

2. All individuals needing access to the main site should be instructed to read and obey all posted placards and signs.

3. The site should be routinely inspected and this or similar report updated with the addition of any antennas or upon any changes to the RF environment including:

- adding new antennas that may have been located on the site
- removing of any existing antennas
- changes in the radiating power or number of RF emitters

4. Post the appropriate **NOTICE**, **CAUTION**, or **WARNING** sign at the main site access point(s) and other locations as required. Note: Please refer to RF Exposure Diagrams in Section 3.1 to inform everyone who has access to this site that beyond posted signs there may be levels in excess of the limits prescribed by the FCC. In addition to RF Advisory Signage, a RF Guideline Signage is recommended to be posted at the main site access point(s). The signs below are examples of signs meeting FCC guidelines.



5. Ensure that the site door remains locked (or appropriately controlled) to deny access to the general public if deemed as policy by the building/site owner.

6. For a General Public environment the five color levels identified in this analysis can be interpreted in the following manner:

- Gray represents areas predicted to be at 5% or less of the General Public MPE limits. *The General Public can access these areas with no restrictions.*
- Green represents areas predicted to be between 5% and 100% of the General Public MPE limits. *The General Public can access these areas with no restrictions.*
- Blue represents areas predicted to be between 100% and 500% of the General Public MPE limits. *The General Public should be restricted from accessing these areas.*
- Yellow represents areas predicted to be between 500% and 5000% of the General Public MPE limits. *The General Public should be restricted from accessing these areas.*
- Red represents areas predicted to be greater than 5000% of the General Public MPE limits. *The General Public should be restricted from accessing these areas.*

7. For an Occupational environment the five color levels identified in this analysis can be interpreted in the following manner:

- Gray represents areas predicted to be at 1% or less of the Occupational MPE limits. *Workers can access these areas with no restrictions.*
- Green represents areas predicted to be between 1% and 20% of the Occupational MPE limits. *Workers can access these areas with no restrictions.*
- Blue represents areas predicted to be between 20% and 100% of the Occupational MPE limits. *Workers can access these areas assuming they have basic understanding of EME awareness and RF safety procedures and understand how to limit their exposure.*
- Yellow represents areas predicted to be between 100% and 1000% of the Occupational MPE limits. *Workers can access these areas assuming they have basic understanding of EME awareness and RF safety procedures and understand how to limit their exposure. Transmitter power reduction and/or time-averaging may be required.*
- Red represents areas predicted to be greater than 1000% of the Occupational MPE limits. *These areas are not safe for workers to be in for prolonged periods of time. Special procedures must be adhered to, such as lockout/tagout or transmitter power reduction, to minimize worker exposure to EME.*

8. Use of a Personal Protective Monitor (PPM): When working around antennas, SiteSafe™ strongly recommends the use of a PPM. Wearing a PPM will properly forewarn the individual prior to entering an RF exposure area.

Keep a copy of this report available for all persons who must access the site. They should read this report and be aware of the potential hazards with regards to RF and MPE limits.

Additional Information

Additional RF information is available at the following sites:

<https://www.fcc.gov/general/radio-frequency-safety-0>
<https://www.fcc.gov/engineering-technology/electromagnetic-compatibility-division/radio-frequency-safety/faq/rf-safety>

OSHA has additional information available at:

<https://www.osha.gov/SLTC/radiofrequencyradiation/index.html>

Appendix E – Regulatory Basis

FCC Rules and Regulations

In 1996, the Federal Communications Commission (FCC) adopted regulations for evaluating the effects of RF exposure in 47 CFR § 1.1307 and 1.1310. The guideline from the FCC Office of Engineering and Technology is Bulletin 65 (“OET Bulletin 65”), *Evaluating Compliance with FCC Guidelines for Human Exposure to Radio Frequency Electromagnetic Fields*, Edition 97-01, published August 1997. Since 1996 the FCC periodically reviews these rules and regulations as per their congressional mandate.

FCC regulations define two separate tiers of exposure limits: Occupational or “Controlled environment” and General Public or “Uncontrolled environment”. The General Public limits are generally five times more conservative or restrictive than the Occupational limits. The General Public limits apply to *accessible* areas where workers or the general public may be exposed to Radio Frequency (RF) electromagnetic fields.

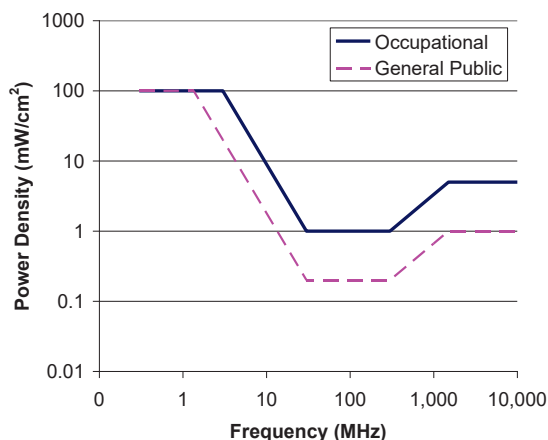
Occupational or Controlled limits apply in situations in which persons are exposed as a consequence of their employment and where those persons exposed have been made fully aware of the potential for exposure and can exercise control over their exposure.

An area is considered a Controlled environment when access is limited to these aware personnel. Typical criteria are restricted access (i.e. locked or alarmed doors, barriers, etc.) to the areas where antennas are located coupled with proper RF hazard signage. A site with Controlled environments is evaluated with Occupational limits.

All other areas are considered Uncontrolled environments. If a site has no access controls or no RF hazard signage it is evaluated with General Public limits.

The theoretical modeling of the RF electromagnetic fields has been performed in accordance with OET Bulletin 65. The Maximum Permissible Exposure (MPE) limits utilized in this analysis are outlined in the following diagram:

FCC Limits for Maximum Permissible Exposure (MPE)
Plane-wave Equivalent Power Density



Limits for Occupational/Controlled Exposure (MPE)				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time E ² , H ² or S (minutes)
0.3-3.0	614	1.63	(100)*	6
3.0-30	1842/f	4.89/f	(900/f ²)*	6
30-300	61.4	0.163	1.0	6
300-1500	--	--	f/300	6
1500-100,000	--	--	5	6
Limits for General Population/Uncontrolled Exposure (MPE)				
Frequency Range (MHz)	Electric Field Strength (E) (V/m)	Magnetic Field Strength (H) (A/m)	Power Density (S) (mW/cm ²)	Averaging Time E ² , H ² or S (minutes)
0.3-1.34	614	1.63	(100)*	30
1.34-30	824/f	2.19/f	(180/f ²)*	30
30-300	27.5	0.073	0.2	30
300-1500	--	--	f/1500	30
1500-100,000	--	--	1.0	30
f = frequency in MHz *Plane-wave equivalent power density				

Appendix F – Safety Plan and Procedures

The following items are general safety recommendations that should be administered on a site by site basis as needed by the carrier.

General Maintenance Work: Any maintenance personnel required to work immediately in front of antennas and / or in areas indicated as above 100% of the Occupational MPE limits should coordinate with the wireless operators to disable transmitters during their work activities.

Training and Qualification Verification: All personnel accessing areas indicated as exceeding the General Population MPE limits should have a basic understanding of EME awareness and RF Safety procedures when working around transmitting antennas. Awareness training increases a worker's understanding to potential RF exposure scenarios. Awareness can be achieved in a number of ways (e.g. videos, formal classroom lecture or internet-based courses).

Physical Access Control: Access restrictions to transmitting antennas locations is the primary element in a site safety plan. Examples of access restrictions are as follows:

- Locked door or gate
- Alarmed door
- Locked ladder access
- Restrictive Barrier at antenna (e.g. Chain link with posted RF Sign)

RF Signage: Everyone should obey all posted signs at all times. RF signs play an important role in properly warning a worker prior to entering into a potential RF Exposure area.

Assume all antennas are active: Due to the nature of telecommunications transmissions, an antenna transmits intermittently. Always assume an antenna is transmitting. Never stop in front of an antenna. If you have to pass by an antenna, move through as quickly and safely as possible thereby reducing any exposure to a minimum.

Site RF Exposure Diagram(s): Section 3 of this report contains RF Diagram(s) that outline various theoretical Maximum Permissible Exposure (MPE) areas at the site. The modeling is a worst-case scenario assuming a duty cycle of 100% for each transmitting antenna at full power. This analysis is based on one of two access control criteria: General Public criteria means the access to the site is uncontrolled and anyone can gain access. Occupational criteria means the access is restricted and only properly trained individuals can gain access to the antenna locations.

SCL0224A Coverage Plots

6155 Bentley Road.
Oakdale, CA 95361

CUSTOMER
FIRST 



**CUSTOMER
FIRST**

This site is located at Southwest Oakdale between Oakdale and Riverbank . It provides road coverage to Albers road between Hwy 108 and Hwy 132. It also provides coverage to surrounding Farmland and Ranch communities, such as Lindy Farms Quarter Horses, Zacky Farms, Rolling Pony Ranch, Los Perez Ranch.

[illegible]

SCL0224A – Site Location (Aerial View)



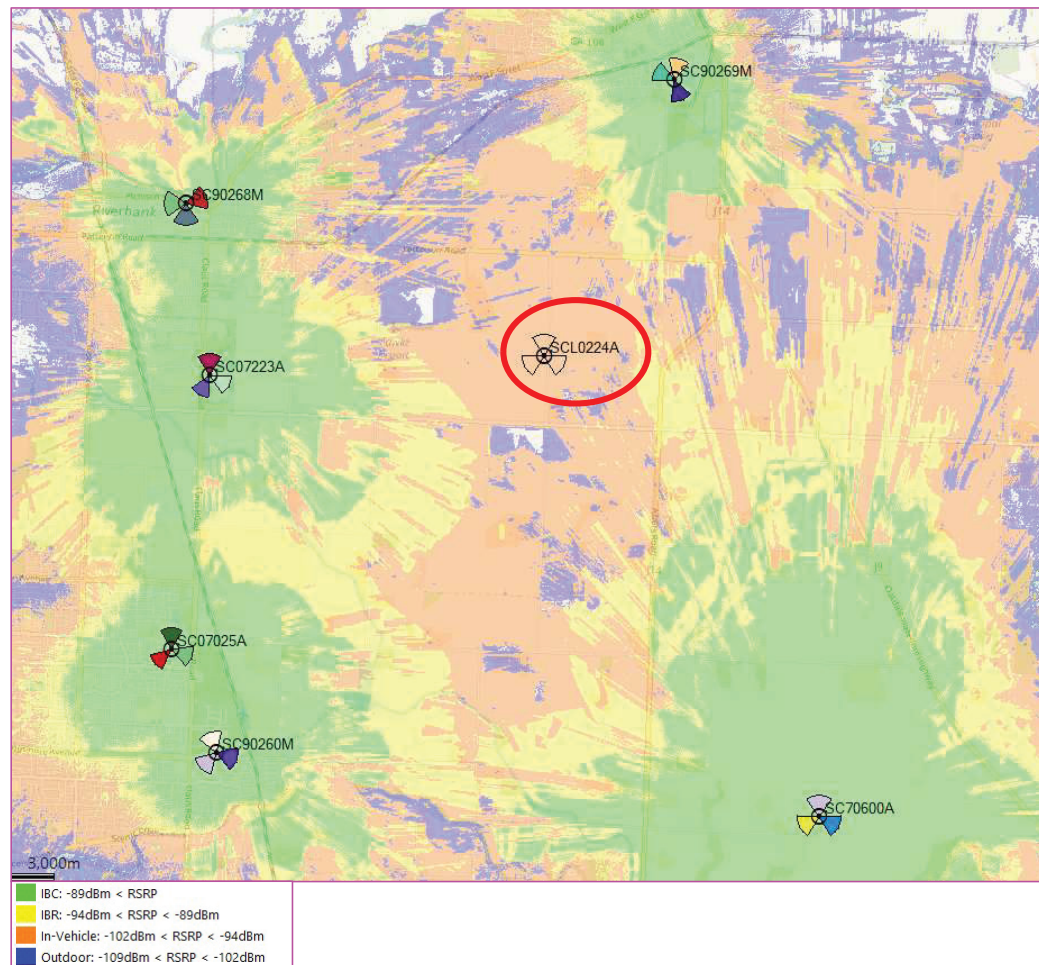
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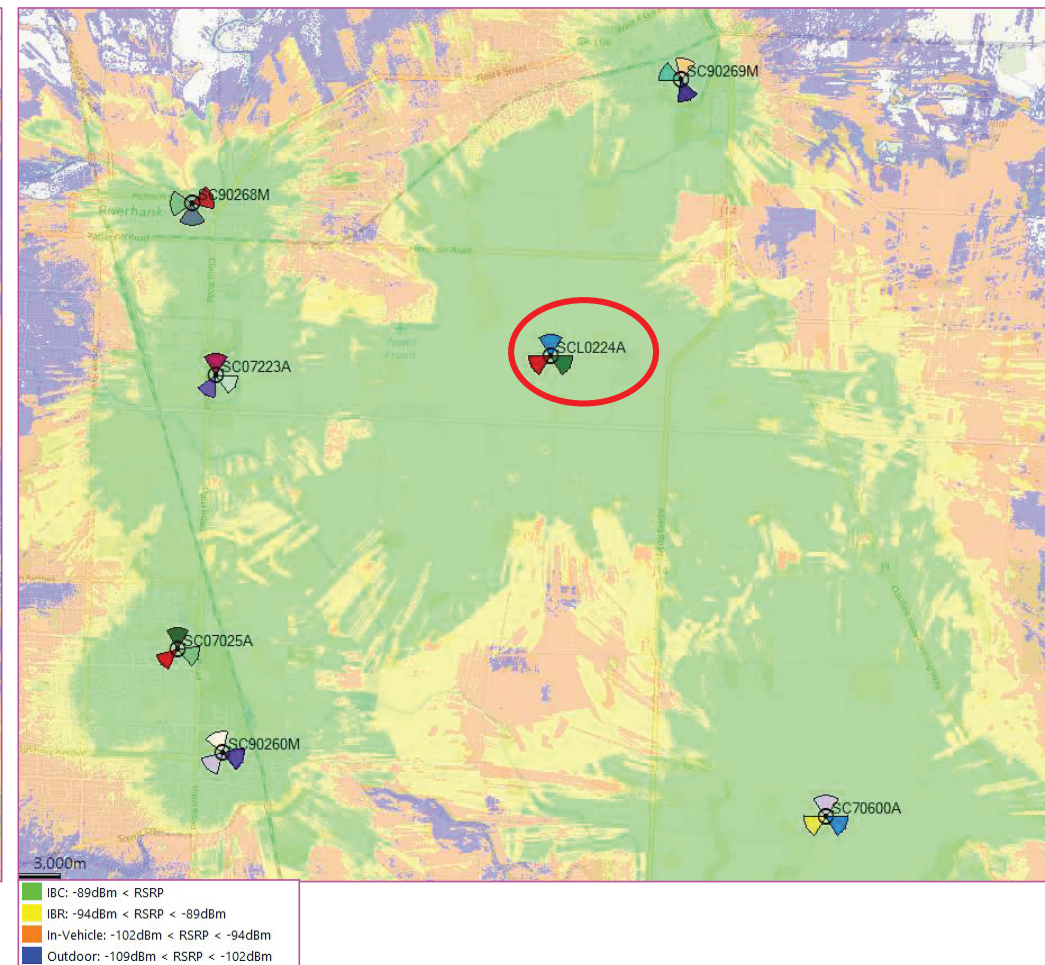
SCL0224A N1900 Coverage



N1900 Coverage – Current Coverage



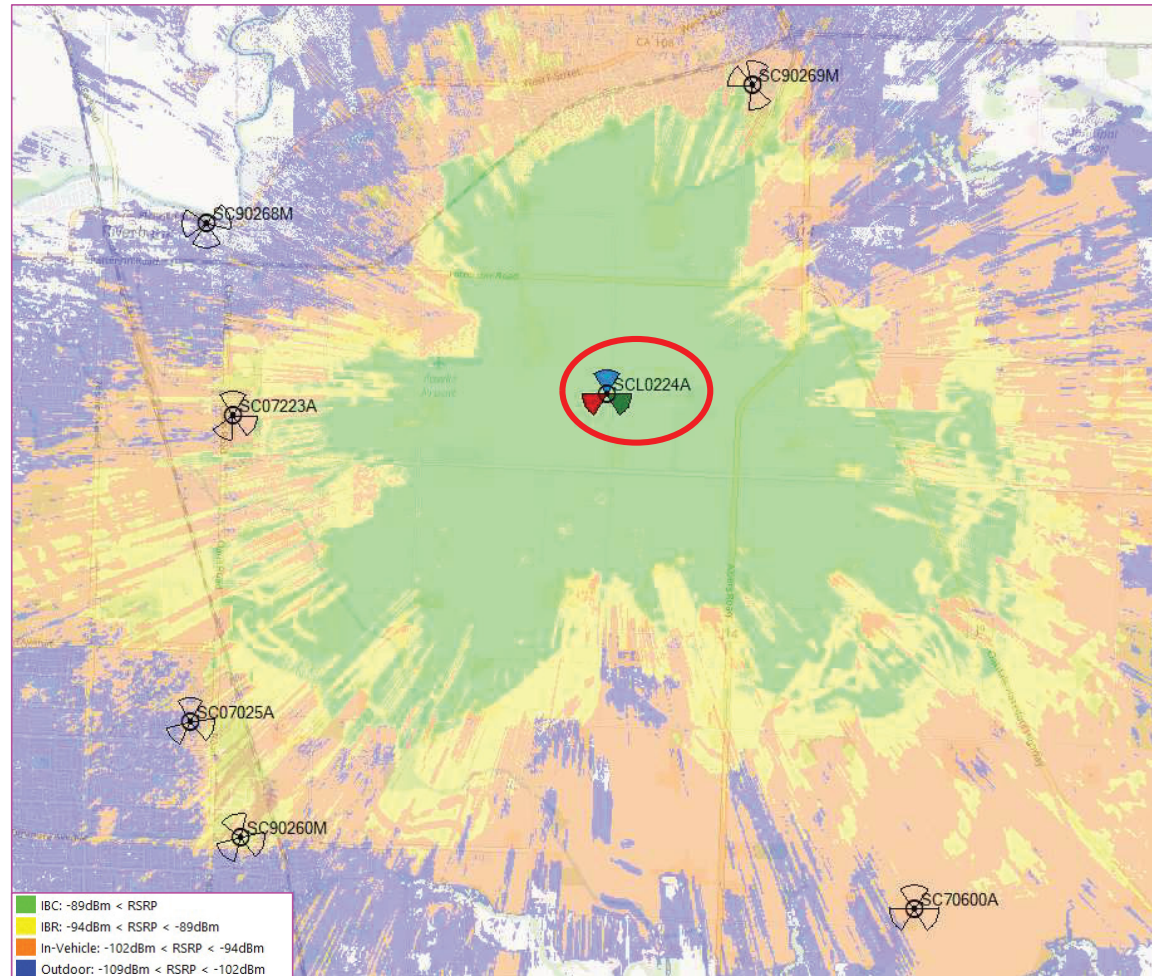
N1900 Coverage – Proposed Coverage



SCL0224A N1900 Standalone Coverage



N1900 Coverage – Standalone Coverage



SCL0224A N1900 - POP's Count



Legend (Proposed)	POP Without Site	POP With Site	Delta
IBC: -95dBm < RSRP	23,098	23,905	807
IBR: -100dBm < RSRP < -95dBm	13,520	14,253	733
In-Vehicle: -108dBm < RSRP < -100dBm	26,521	27,406	885
Outdoor: -115dBm < RSRP < -108dBm	32,739	47,496	14,757
Total POP Count	95,878	113,060	17,182



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YOU
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US?**

T-Mobile™