

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:
APPLICATION OF NEW CINGULAR WIRELESS
PCS, LLC (AT&T) FOR A CERTIFICATE OF
ENVIRONMENTAL COMPATIBILITY AND
PUBLIC NEED FOR THE CONSTRUCTION,
MAINTENANCE AND OPERATION OF A
TELECOMMUNICATIONS TOWER FACILITY
AT 85 PAPER MILL ROAD IN THE TOWN OF
WOODBURY

DOCKET NO. 375

February 3, 2009



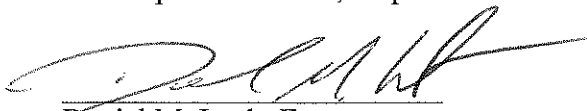
CONNECTICUT
SITING COUNCIL

MOTION FOR A PROTECTIVE ORDER RELATED TO DISCLOSURE
OF THE EXACT MONTHLY RENT IN THE
LEASE AGREEMENT BETWEEN AT&T AND JODIE A. BRYAN

In furtherance of the Council's recent ruling in Docket 366, the Applicant respectfully moves for a protective order related to the disclosure of the exact monthly rent and other compensation identified in its lease agreement with the owner of the Premises at 85 Paper Mill Road Ms. Jodie A. Bryan. The Siting Council's evaluation of AT&T's proposed facility should not be based on the financial terms of AT&T's agreement with Ms. Bryan as it does not relate to the criteria set forth in Section 16-50p of the Connecticut General Statutes. Additionally, AT&T considers the specific amount of rent that these parties agreed upon as proprietary corporate information. It is respectfully submitted that the specific monthly rent of the lease agreement between AT&T and Ms. Bryan is not relevant to this proceeding and should be excluded from any public disclosure. In furtherance of this motion, an unredacted copy of the lease pages specifying the monthly rent and other terms have been provided in the attached sealed envelope and marked "Proprietary-Confidential" with a redacted copy of the lease attached to this motion and provided in furtherance of Section 16-50o(c) of the Connecticut General Statutes.



Christopher B. Fisher, Esq.



Daniel M. Laub, Esq.