

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

DOCKET NO. 376

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 24 DINGLEBROOK LANE IN THE TOWN OF
NEWTON

DOCKET NO. _____

RECEIVED
February 17, 2009
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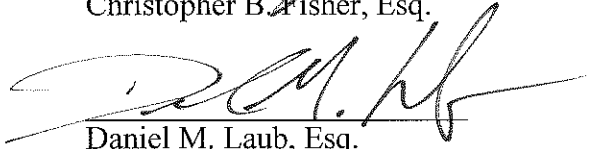
CONNECTICUT
SITING COUNCIL

MOTION FOR A PROTECTIVE ORDER RELATED TO DISCLOSURE
OF THE EXACT MONTHLY RENT IN THE
LEASE AGREEMENT BETWEEN AT&T AND BARRY LUNDGREN, KARL LUNDGREN
AND LINDA LUNDGREN

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 in its lease agreement with Barry Lundgren, Karl Lundgren and Linda Lundgren (together "the Landlord"). 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 the Landlord 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 the Landlord as well as other financial terms 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 financial terms has 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.