

KENNETH C. BALDWIN

One State Street
Hartford, CT 06103
Main (860) 275-8200
Fax (860) 275-8299
kbaldwin@rc.com
Direct (860) 275-8345

Also admitted in Massachusetts
and New York

December 19, 2024

Via Electronic and First-Class Mail

Melanie A. Bachman
Acting Executive Director
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Cellco Partnership d/b/a Verizon Wireless telecommunications facility located at 36 Ritch Avenue, Greenwich, Connecticut**

Enforcement Action Consent Order

Dear Attorney Bachman:

Pursuant to the Enforcement Action Consent Order (“Order”) issued by the Council on December 5, 2024, provided below and in the attached document is the information requested.

Pursuant to Conditions No. 1 and 7 of the Siting Council’s Enforcement Action Consent Order (“Order”) issued on December 5, 2024, attached is a redacted copy of the Master Agreement between Verizon Communications Inc. (“Verizon”) and American Tower Corporation (“ATC”) (the “Agreement”) related to the maintenance and operation various wireless facilities in Connecticut. A list of the Verizon sites subject to the Agreement was provided to the Council on November 19, 2024. An un-redacted copy of the Agreement has been provided subject to a Motion for Protective Order attached to this filing.

The ATC contacts for the facilities described in the Agreement are: Brigette Spillane, Esq. Brigitte.Spillane@americantower.com and Greg Mercier Greg.Mercier@AmericanTower.com in ATC’s Legal Department.

30999133-v1

Robinson+Cole

Melanie A. Bachman

December 19, 2024

Page 2

Thank you for your assistance and cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Kenneth C. Baldwin". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kenneth C. Baldwin

Attachments

Copy to:

Brigette Spillane, Esq.

Greg Mercier

Tim Parks

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
: :
CELLCO PARTNERSHIP D/B/A VERIZON :
WIRELESS FOR A CERTIFICATE OF :
ENVIRONMENTAL COMPATIBILITY AND :
PUBLIC NEED FOR THE CONSTRUCTION, :
MAINTENANCE AND OPERATION OF A :
WIRELESS TELECOMMUNICATIONS :
FACILITY AT 36 RITCH AVENUE IN :
GREENWICH, CONNECTICUT : DECEMBER 19, 2024

**MOTION FOR PROTECTIVE ORDER
ENFORCEMENT ACTION CONSENT ORDER**

Cellco Partnership d/b/a Verizon Wireless, a subsidiary of Verizon Communications, Inc (“Verizon”) respectfully requests that the Connecticut Siting Council (“Council”) issue a Protective Order pursuant to Connecticut General Statutes section 1-210(b)(5), with respect to certain terms of a Master Agreement (the “Agreement”), between Verizon and American Tower Corporation (“ATC”) (the “Agreement”), submitted in connection with an Enforcement Action Consent Order issued by the Council on December 5, 2024.

Connecticut General Statutes section 16-50o provides, in relevant part:

The applicant shall submit into the record the full text of the terms of any agreement . . . entered into by the applicant . . . in connection with the construction or operation of the facility. This provision shall *not* require the disclosure of proprietary information or trade secrets.


Conn. Gen. Stat. § 16-50o(c) (emphasis added). Pursuant to this requirement, Verizon submitted a redacted copy of the Agreement to the Council in response to Condition Nos. 1 and 7 of the Enforcement Action Consent Order. The redacted provisions relate to financial terms and other confidential information contained in the Agreement (“Confidential Information”). Verizon is willing to submit an unredacted copy of the Agreement to the Council subject to the issuance of

a Protective Order that would limit disclosure of the Confidential Information to the Council and its staff.

As reflected in the attached Affidavit of Anthony Befera, Principal Engineer, Real Estate/Regulatory for Verizon, the information for which Verizon seeks protected treatment is commercially valuable, confidential and proprietary, market-sensitive information that constitutes trade secrets within the meaning of Connecticut General Statutes §1-210(b)(5), and which Verizon has heretofore used its best efforts to maintain as secret in order to avoid the harm that would result if the Confidential Information were to become publicly available. The Council has historically granted protected treatment of similar filings.

WHEREFORE, Verizon respectfully requests that the Council grant the request for protected treatment consistent with the attached Protective Order for the Agreement, which would limit disclosure of the Confidential Information to the Council and its staff.

Respectfully submitted,

By 

Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
One State Street
Hartford, CT 06103
Its Attorneys