

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

IN RE: :  
 :  
 APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 456  
 D/B/A VERIZON WIRELESS FOR A :  
 CERTIFICATE OF ENVIRONMENTAL :  
 COMPATIBILITY AND PUBLIC NEED FOR :  
 THE CONSTRUCTION OF A WIRELESS :  
 TELECOMMUNICATIONS FACILITY AT 33 :  
 KEEGAN ROAD, PLYMOUTH, :  
 CONNECTICUT : FEBRUARY 27, 2015

**MOTION FOR PROTECTIVE ORDER**

Cellco Partnership d/b/a Verizon Wireless (“Cellco”) 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 an Option and Land Lease Agreement (the “Agreement”), dated March 24, 2014, between Steven A. Westall and Cellco (the “Agreement”), submitted to the Council in connection with the above-referenced proceeding.

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, Cellco submitted a redacted copy of the Agreement to the Council in the Docket No. 456 Application. (*See* Application, Tab 17). The redacted provisions relate to financial terms and other confidential information contained in the Agreement (“Confidential Information”). Cellco is willing to

submit unredacted copies 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 Alexandria M. Carter, Regulatory Manager for Cellco, the information for which Cellco 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 Cellco 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**, Cellco 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,  
CELLCO PARTNERSHIP d/b/a VERIZON  
WIRELESS

By   
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