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March 24, 2017

VIA ELECTRONIC MAIL AND FIRST CLASS MAIL

Attorney Melanie Bachman
Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Docket No. 471 – Objection to Motion for Protective Order

Dear Attorney Bachman:

On behalf of Ms. Patricia Sorrentino, a party in this Docket, enclosed please find an original and fifteen copies of her Objection to the Motion for Protective Order submitted on behalf of Verizon Wireless.

As set forth in the Objection, we read General Statutes § 16-50o(c) as requiring the entire agreement related to an application, particularly the consideration for the agreement, to be submitted on the public record. Further, the consideration for a commercial ground lease is not a "trade secret" under the plain language of its statutory definition set forth in the Connecticut Freedom of Information Act at Conn. Gen. Stat. § 1-210(b)(5)(A). Also, the consideration for a commercial ground lease is not "commercial or financial information, not required by statute" under Conn. Gen. Stat. § 1-210(b)(5)(B). Significantly, the consideration of Verizon Wireless tower leases throughout the United States is readily available on the public Internet, a small sample of which are included as exhibits to the Objection.

For all of these reasons, as detailed in the enclosed Objection, the Council respectfully must deny with prejudice the Motion for Protective Order.

Thank you for your consideration.

Respectfully submitted,

By: _____
Burton B. Cohen
Attorney for Patricia Sorrentino

Enclosures

cc: Service List – Docket No. 471