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March 15, 2018

Melanie A. Bachman, Esq.
Executive Director/Staff Attorney
Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

Re: **Docket No. 482 – Application of Celco 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 Located at 917 Exeter Road, Lebanon, Connecticut**

Dear Ms. Bachman:

Enclosed is the original and fifteen (15) copies of a Motion for Protective Order, Affidavit of Anthony R. Befera, and a proposed Protective Order for the Council's review and consideration.

Please contact me if you have any questions regarding this matter.

Sincerely,



Kenneth C. Baldwin

KCB/kmd
Enclosures

1775755-v1

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
 APPLICATION OF CELLCO PARTNERSHIP : DOCKET NO. 482
 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 917 :
 EXETER ROAD, LEBANON, CONNECTICUT : MARCH 15, 2018

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 October 16, 2017, between the Town of Lebanon 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. 482 Application. (*See* Application, Attachment 18). The redacted provisions relate to financial terms and other confidential information contained in the Agreement (“Confidential Information”). Cellco 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 R. Befera, Principle Engineer – Real Estate/Regulatory 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 
Kenneth C. Baldwin, Esq.
Robinson & Cole LLP
280 Trumbull Street
Hartford, CT 06103-3597
Its Attorneys

