

STATE OF CONNECTICUT  
CONNECTICUT SITING COUNCIL

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 ST. MATTHEW LUTHERAN CHURCH AT  
224 LOVELY STREET IN THE TOWN OF AVON

DOCKET NO. 373

JANUARY 9, 2009

RECEIVED  
JAN - 9 2009

CONNECTICUT  
SITING COUNCIL

MOTION FOR A PROTECTIVE ORDER RELATED TO DISCLOSURE  
OF THE EXACT MONTHLY RENT IN THE  
LEASE AGREEMENT BETWEEN AT&T AND ST. MATTHEW LUTHERAN CHURCH

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 the St. Matthew Lutheran Church. 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 St. Matthew Lutheran Church 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 St. Matthew Lutheran Church 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 page specifying the monthly rent 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.

  
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Christopher B. Fisher, Esq.

  
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Daniel M. Laub, Esq.