

STATE OF CONNECTICUT  
SITING COUNCIL

T-Mobile Northeast, LLC : DOCKET #421  
Application for a Certificate  
of Environmental Compatibility and Public Need :  
For a Telecommunications Facility Located :  
at Edison Road, Trumbull, Connecticut. :  
: DECEMBER 5, 2011

**RESPONSE AND CLARIFICATION OF INTERROGATORY RESPONSES AND  
OBJECTION TO MOTION FOR ORDER OF COMPLIANCE**

The Citizens Against Trumbull Tower, ("CATT") a voluntary association, hereby object to the motion for order of compliance and responds and clarifies its responses to Interrogatories as follows.

1. First, CATT supplements its responses regarding Kevin Plumb's curriculum vitae. The request was for a CV used within the last 4 years. The CV prepared more than 4 years ago is attached to this response.
2. CATT's expert, Mr. Plumb, provided verbal reports to CATT and did not have reports to disclose. The studies he performed were a review of the Applicant's application and other submitted materials. CATT has not created independent data to disclose.
3. The members of CATT have been disclosed. The Executive Committee are the members of CATT, the remaining persons associated with CATT are donors. Due process does not require the disclosure of donors. Had T-Mobile bothered to look, Lois Gillern resides at 20 Merwin Street which is as close as one can live to the proposed facility, providing her with classical aggrievement in addition to CATT's statutory aggrievement. Also, CATT's address is listed as being through its attorney and the addresses of every member is listed next to their name.

There are no other addresses to disclose.

4. While T-Mobile clearly seeks a more formal presentation of the technical analyses performed by CATT, CATT has no more to disclose than that it has reviewed the Applicant's materials submitted to the Council and the documents submitted in the pre-filed testimony. In addition, CATT's members are people who know their neighborhood and can verify that their neighborhood will be marred by the placement of an enormously out-of-scale industrial structure in their midst. This is an assertion made through the ordinary observation of people living in a residential neighborhood. It simply does not take an expert witness to assess the potential damage.

CATT respectfully objects to the provision of responses before the motion has been heard and the sanction of testimony preclusion is out of proportion to the alleged wrong. Further, CATT responded to the Interrogatories 1, 23-28 with an affirmative response as was requested. It seemed obvious that further detail was unavailable with the exception of CV drafted within 4 years.

Respectfully Submitted,  
Citizens Against Trumbull Tower,

By \_\_\_\_\_  
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## CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing was deposited in the United States mail, first-class, postage pre-paid this 5<sup>th</sup> day of December, 2011 and addressed to:

Ms. Linda Roberts, Executive Director, Connecticut Siting Council, 10 Franklin Square, New Britain, CT 06051 ( 1 electronic) (hand delivery to be made to the Council Dec 6th).

T-Mobile Northeast, LLC c/o Julie D. Kohler, Esq., Jesse A. Langer, Esq. Cohen and Wolf, P.C. 1115 Broad Street, Bridgeport, CT 06604 (203) 368-0211, (203) 394-9901 fax [jkohler@cohenandwolf.com](mailto:jkohler@cohenandwolf.com) , [jlanger@cohenandwolf.com](mailto:jlanger@cohenandwolf.com) (electronic and hand delivery on Dec 6th)

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Keith R. Ainsworth, Esq.