

**JESSE A. LANGER**

PLEASE REPLY TO: Bridgeport  
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January 9, 2012

**VIA REGULAR MAIL and  
ELECTRONIC MAIL**

Ms. Linda L. Roberts  
Connecticut Siting Council  
10 Franklin Square  
New Britain, CT 06051

**Re: Docket No. 421 – Application by T-Mobile Northeast LLC  
for a Certificate of Environmental Compatibility and Public  
Need for a Telecommunications Facility at 158 Edison Road  
in the town of Trumbull, Connecticut**

Dear Ms. Roberts:

I write on behalf of the Applicant, T-Mobile Northeast LLC ("T-Mobile"), with respect to the above-captioned docket. Specifically, I write in response to the request for continuance of the third day of the hearing, presently scheduled for February 7, 2012, submitted by the Intervenor, Citizens Against Trumbull Tower ("CATT"), dated January 9, 2012.

T-Mobile respectfully objects to the continuance request for the following reasons:

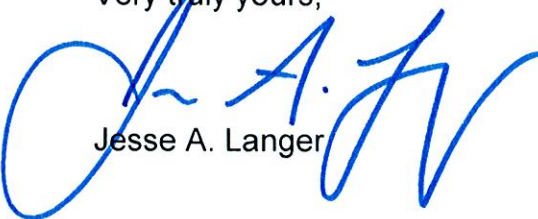
1. The Connecticut Siting Council ("Council") has already denied a request for continuance by T-Mobile because of witness availability. The Council did so in part because some of CATT's witnesses were not going to be available at later dates and to otherwise accommodate CATT.
2. The Council further accommodated CATT by allowing its witnesses to testify out of order. The Council has, therefore, already accommodated CATT with respect to scheduling.
3. The reason for the continuance is Mr. Plumb's unavailability. Mr. Plumb, however, has already testified, has been subject to cross-examination and to re-direct examination. His presence is not necessary. A hearing should not be continued to accommodate the schedule of a witness who has already testified.
4. CATT's "affirmative" presentation is over. CATT is currently cross-examining T-Mobile's witnesses. The presence of CATT's witnesses is not instrumental to the proceedings. In other words, CATT will not be prejudiced by the denial of its continuance request.

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5. It is difficult for T-Mobile to coordinate the schedules of its seven witnesses and doing so may impose a hardship because T-Mobile may have to present some evidence on re-direct examination.
6. T-Mobile would like to close the proceedings as this would be the third day of the hearing.

Accordingly, T-Mobile respectfully requests that the Council deny CATT's request for a continuance and proceed with the third day of the hearing on February .

Very truly yours,



Jesse A. Langer

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cc: Service List