

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE:

APPLICATION OF HOMELAND TOWERS, LLC
(HOMELAND) AND 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 IN RIDGEFIELD, CONNECTICUT

DOCKET NO. 445

April 2, 2014

MOTION FOR A PROTECTIVE ORDER RELATED TO DISCLOSURE
OF THE EXACT MONTHLY RENT IN THE LEASE AGREEMENT BETWEEN
HOMELAND TOWERS, LLC (LESSOR) AND INSITE TOWERS, LLC AND
COMMUNICATIONS LICENSE AGREEMENT BETWEEN HOMELAND TOWERS LLC
AND NEW CINGULAR WIRELESS PCS, LLC

In furtherance of the Council's ruling in Docket 366, Applicant Homeland Towers, LLC ("Homeland Towers"), respectfully moves for a protective order related to the disclosure of the exact monthly rent and financial terms in the Ground Lease Agreement with Insite Towers, LLC (Insite Towers) and in the Communications License Agreement with New Cingular Wireless, PCS, LLC ("AT&T") (Together the "Agreements"). The Siting Council's evaluation of the Applicants' proposed facility should not be based on the financial terms of Homeland Tower's Agreements as that information does not relate to the criteria set forth in Section 16-50p of the Connecticut General Statutes. Additionally, Homeland Towers considers the specific amount of rent and other financial terms that these parties agreed upon as proprietary corporate information. It is respectfully submitted that the specific monthly rent and other financial terms of the Agreements are not relevant to this proceeding and should be excluded from any public disclosure. In furtherance of this motion, portions of the Agreements with the unredacted portions specifying the monthly rent and other financial terms has been provided in the included sealed envelope and marked "Confidential: Disclosure of the Contents is Bound by Protective Order Issued by the Siting Council" with a redacted copy of the lease included with this motion and provided in furtherance of Section 16-50o(c) of the Connecticut General Statutes.



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