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February 8, 2018

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Deployment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Deployment, WT Docket No. 17-84

Dear Ms. Dortch:

On February 6, 2018, Tamara Preiss and Andy Lachance of Verizon spoke by telephone with Will Adams, legal advisor to Commissioner Carr, about the above-referenced proceedings.

We discussed how the Commission's definitions of small wireless facilities and exclusions from historic preservation review apply to 4G and 5G deployments. The definitions of "small wireless antennas and associated equipment" include separate volumetric limits for antennas and for associated equipment.¹ Unlike 4G small cells where the antenna is a separate and distinct piece of equipment from the radio units, however, 5G small cells will integrate the antenna and the radio into a single piece of equipment.

We suggested, therefore, that the Commission make clear in any future orders that the applicable volumetric limit depends on where the equipment is mounted. So for any equipment mounted at the top of the pole – where 4G antennas are typically mounted – the antenna volumetric limit would apply. And if the equipment is mounted below the top of the pole, then the associated equipment volumetric limit would apply.

This clarification is important because some 5G equipment – which will be only about the size of a 4G small cell antenna – will be mounted on the same poles where 4G small cells are located. This will allow the company to leverage existing fiber, cable, and attachment agreements to speed deployment. But because the Commission's small facility volumetric limits are cumulative, having the flexibility to determine where to mount the equipment on the pole so that the equipment fits within the existing small facility size limits is essential.

Sincerely,

cc: Will Adams

¹ See *Wireless Telecommunications Bureau Announces Execution of First Amendment to the Nationwide Programmatic Agreement for the Collocation of Wireless Antennas*, Public Notice, 31 FCC Rcd 8824 (WTB 2016), codified at 47 U.S.C. Part 1, Appendix B, Section VI.A.5 ("Collocation Agreement Amendment").