

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Accelerating Wireless Broadband)	WT Docket No. 17-79
Deployment by Removing Barriers to)	
Infrastructure Investment)	
)	
Comment Sought on Draft Program)	
Comment for the Federal Communications)	
Commission's Review of Collocations on)	
Certain Towers Constructed Without)	
Documentation of Section 106 Review)	

COMMENTS OF MOBILE FUTURE

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Mobile Future submits these comments in support of the Commission's draft Program Comment to govern the review of collocations on certain towers constructed without documentation of Section 106 historic preservation review ("Twilight Towers").¹

I. INTRODUCTION.

Mobile Future applauds the Commission's continued focus on removing barriers to wireless infrastructure deployment. Wireless providers are moving quickly to develop and deploy advanced 4G LTE and next-generation 5G services that will unleash the Internet of Things and offer connectivity in new ways across every aspect of life.² However, making advanced 4G LTE and 5G a reality in the United States depends on the ability of providers to deploy a significant amount of new infrastructure. It is critical that the Commission pursue smart

¹ See *Comment Sought on Draft Program Comment for the Federal Communications Commission's Review of Collocations on Certain Towers Constructed Without Documentation of Section 106 Review*, Public Notice, 32 FCC Rcd 10715 (2017) (respectively, "*Public Notice*" and "*Draft Program Comment*").

² See, e.g., Comments of Mobile Future, WT Docket No. 17-79 (June 15, 2017).

pro-investment policies that will facilitate the ability of wireless infrastructure builders to meet the burgeoning demands for the increased capacity. The Commission's proposal to eliminate historic preservation reviews for certain collocations on Twilight Towers is an important and beneficial step towards this goal. Adopting the proposal will make much needed infrastructure available for wireless deployments that serve the public interest, without adversely affecting historic properties. For these reasons, Mobile Future fully supports the draft Program Comment and urges swift action to ensure continued U.S. global leadership in mobile broadband.

II. ACCELERATING WIRELESS INFRASTRUCTURE DEPLOYMENT IS CRITICAL TO ADVANCE CONTINUED U.S. LEADERSHIP IN MOBILE BROADBAND.

Consumer demand for wireless services is already at an all-time high, and will only accelerate as we transition to 5G. U.S. mobile data traffic grew 44 percent in 2016, and is expected to grow five-fold between 2016 and 2021.³ According to Ericsson, on a per smartphone basis, data traffic in North America is expected to grow at a compound rate of 37 percent every year over the next five years, reaching 48 gigabytes per month by 2023.⁴ Bandwidth-intensive applications will be a primary demand-driver. Indeed, technologists predict that as early as 2020, half of all television and video viewing will be on mobile devices.⁵

³ Cisco, *Cisco VNI Mobile Forecast Highlights, 2016-2021*, http://www.cisco.com/assets/sol/sp/vni/forecast_highlights_mobile (last visited Feb. 9, 2018) (*"Cisco VNI Mobile Forecast"*).

⁴ Ericsson, *Ericsson Mobility Report*, at 12, 31 (Nov. 2017), <https://www.ericsson.com/assets/local/mobility-report/documents/2017/ericsson-mobility-reportnovember-2017.pdf> (*"Ericsson Mobility Report"*).

⁵ *Id.* at 11.

Furthermore, by 2021, video will account for 76 percent of total mobile data traffic (up from 64 percent in 2016).⁶

In addition to the benefits of advanced 4G LTE, 5G promises to be a transformative technology, ushering in a new paradigm of connectivity. Ericsson, for example, predicts there will be over 30 billion connected devices in use worldwide by 2023, ranging from connected cars to machine meters to consumer electronics.⁷ 5G will also be an economic growth accelerant. One analyst predicts that 5G could create as many as three million new American jobs and boost the U.S. GDP by approximately \$500 billion.⁸ Businesses across a wide range of sectors stand to benefit from the faster speeds, lower latency, and increased bandwidth it promises to provide. It is therefore no surprise that 5G has emerged as a priority across a wide swath of industries critical to U.S. economic growth. In a recent survey, 74 percent of respondents from 10 key industries said that they were planning to invest in order to leverage 5G technologies to create value for customers.⁹ Over 70 percent of companies plan to have use cases in production by 2021.¹⁰

⁶ *Cisco VNI Mobile Forecast*.

⁷ *Ericsson Mobility Report* at 14.

⁸ See Accenture Strategy, *How 5G Can Help Municipalities Become Vibrant Smart Cities*, at 3 (Jan. 12, 2017), https://newsroom.accenture.com/content/1101/files/Accenture_5G-Municipalities-Become-Smart-Cities.pdf (“*Accenture Smart Cities Report*”).

⁹ Ericsson, *The Industry Impact of 5G*, at 4 (Jan. 2018), <https://www.ericsson.com/assets/local/narratives/networks/documents/report-bnew-18000486-rev-a-uen.pdf>.

¹⁰ *Id.* at 5.

To realize this potential fully, American businesses need to invest massively in new wireless infrastructure.¹¹ Accenture, for example, predicts 5G buildout will involve 10 to 100 times more antenna sites than 3G or 4G.¹² Even before we get to ubiquitous 5G deployment, demand for advanced 4G services continues to rise, requiring carriers to deploy new infrastructure capable of taking advantage of additional spectrum bands, as Verizon is doing by deploying AWS spectrum to augment its 700 MHz 4G spectrum. Further, making these existing towers available for collocation could help support the build-out by eventual Mobility Fund II auction winners, who will be bringing 4G LTE to areas that currently lack it.

III. ADOPTING THE DRAFT PROGRAM COMMENT WILL RAPIDLY DEPLOY INFRASTRUCTURE WITH MINIMAL OR NO DISRUPTION TO HISTORIC PROPERTIES.

Eliminating Section 106 review for collocations on Twilight Towers would help providers meet the increasing demand for wireless services. Indeed, unlocking these towers – about 4,300 in total – could facilitate as many as 6,500 additional collocations.¹³ Collocating is

¹¹ See *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, Notice of Proposed Rulemaking and Notice of Inquiry, 32 FCC Rcd 3330, 3343 ¶ 32 (2017) (observing that “improving spectral efficiency for future 4G and 5G services by providing end users with higher quality connections, more bandwidth and lower latency will require significant densification of DAS and small cell facilities”) (“*Wireless Infrastructure NPRM*”).

¹² *Accenture Smart Cities Report* at 1.

¹³ See *Draft Program Comment*, 32 FCC Rcd at 10727 n.8 (citing Letter from Brian Josef, Assistant Vice President, Regulatory Affairs, CTIA-The Wireless Association, and D. Zachary Champ, Assistant Vice President, Regulatory Affairs, PCIA-The Wireless Infrastructure Association, to Chad Breckinridge, Associate Chief, WTB, FCC, (June 4, 2015)); *Public Notice*, 32 FCC Rcd at 10722.

often the “most efficient” solution for providers seeking to densify their networks.¹⁴ Making Twilight Towers readily available for collocation would also reduce the need to construct new towers – a goal shared by industry and State Historic Preservation Officers (“SHPOs”) alike.¹⁵ Importantly, these public interest benefits can be achieved without adversely affecting historic properties. For example, in recognition of these and other public interest benefits, “[t]he Commission’s rules have long excluded most collocations of antennas from Section 106 review.”¹⁶ This exclusion was premised on the correct understanding that “the effects on historic properties of collocations on buildings, towers, and other structures are likely to be minimal and not adverse.”¹⁷ And as even some SHPOs have noted, these towers are likely not to have major effects.¹⁸ They have been standing for at least 13 years and, in the “vast majority of cases, no adverse effects from these towers have been brought to the FCC’s attention.”¹⁹ In fact, the “vast

¹⁴ *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993 Annual Report and Analysis of Competitive Market Conditions With Respect to Mobile Wireless, Including Commercial Mobile Services*, Twentieth Report, 32 FCC Rcd 8968, 9001 ¶ 46 (2017).

¹⁵ *See, e.g.*, Comments of the National Association of Tower Erectors, WT Docket No. 17-79, at 2 (Jan. 18, 2018) (noting that permitting greater collocations would help “reduce the number of new towers and therefore reduce the amount of ground disturbance that comes with new construction”); Comments of National Conference of State Historic Preservation Officers, WT Docket No. 17-79, at 1 (Dec. 7, 2017) (agreeing that “it would be advantageous for industry to be able to utilize existing towers to collocate equipment rather than requiring the installation of additional ones”) (“NCSHPO Comments”).

¹⁶ *Wireless Infrastructure NPRM*, 32 FCC Rcd at 3355 ¶ 72.

¹⁷ *See Draft Program Comment*, 32 FCC Rcd at 10728.

¹⁸ *See* Comments of National Trust for Historic Preservation, WT Docket No. 17-79, at 2 (Dec. 7, 2017) (conceding that “the majority of these Twilight Towers are likely to have no adverse effects”); NCSHPO Comments at 2 (observing that “many towers have had no adverse effects”).

¹⁹ *Draft Program Comment*, 32 FCC Rcd at 10727. *See also* Joint Comments of CTIA and the Wireless Infrastructure Association, WT Docket No 17-79, at 39 (June 15, 2017) (noting that

majority of towers [Twilight or otherwise] that have been reviewed ... have had no adverse effects on historic properties.”²⁰

As Commissioner O’Rielly correctly noted, “these towers already exist and, in most cases, were never the subject of a complaint; it would take millions of dollars and years to create a list of all the twilight towers and have them individually reviewed; and in the meantime, these towers would continue to be underutilized, to the detriment of consumers.”²¹ In contrast, continuing to require tower-by-tower review before permitting collocation on these towers would not only be inefficient and costly, but also would continue to deny consumers the benefits of next-generation wireless services. Consumers have already been prevented from enjoying “the many benefits from fully loaded towers, including increased network coverage.”²² Forcing them to wait even longer would impose additional burdens and delays without a corresponding benefit.

Finally, Mobile Future agrees with the Commission that seeking a Program Comment from the Advisory Council for Historic Preservation (“ACHP”) is an appropriate vehicle for resolving longstanding concerns around Twilight Towers. The ACHP rules permit agencies to pursue “alternatives” to the Section 106 process, including a program comment, to reduce the scope of, or entirely eliminate, the Section 106 review process where an activity has minimal

“only 0.33 percent of Tribal reviews of wireless infrastructure projects result in a finding of adverse effect”).

²⁰ *Wireless Infrastructure NPRM*, 32 FCC Rcd at 3359 ¶ 82.

²¹ *Id.*

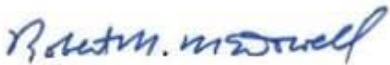
²² *Public Notice*, 32 FCC Rcd at 10722.

potential to adversely affect historic properties.²³ Here, the draft Program Comment would allow the Commission “to comply with Section 106 in an efficient and targeted manner,”²⁴ expediting wireless deployment without adversely affecting historic property.

IV. CONCLUSION.

For the foregoing reasons, Mobile Future urges the Commission to work with the ACHP to swiftly adopt and implement the draft Program Comment. Taking these actions will make much needed infrastructure available to support wireless broadband deployment all without adversely affecting historic properties.

Respectfully submitted,



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²³ 36 C.F.R. §§ 800.14(a); 800.14(c)(1)(ii); 800.14(e); *see also Public Notice*, 32 FCC Rcd at 10717.

²⁴ *Comment Sought on Draft Program Comment to Govern Review of Positive Train Control Facilities Under Section 106 of the National Historic Preservation Act*, Public Notice, 29 FCC Rcd 694, 697 (WTB 2014).