



Wireless
Infrastructure
Association

October 22, 2018

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Communication, Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT-Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84

Dear Ms. Dortch:

On October 18, 2018, Farhan Chughtai and the undersigned of the Wireless Infrastructure Association (WIA)¹ met with staff from the Federal Communication's Commission (Commission) Wireless Telecommunications Bureau (WTB). Those present were: Garnet Hanly, WTB Deputy Bureau Chief, Suzanne Tetreault, WTB Deputy Chief, Jiaming Shang, Competition & Infrastructure Policy Division (CIPD) Deputy Chief, and Jonathan Campbell and David Sieradzki, WTB Legal Advisors.

In the meeting, consistent with previous filings, WIA asked the Commission to harmonize the differing rules that apply to compound expansions. WIA noted that its members continue to face regulatory hurdles when applying for Eligible Facilities Requests (EFRs) under Section 6409 of the Spectrum Act (Section 6409).² WIA

¹ The Wireless Infrastructure Association (WIA) is the principal organization representing companies that build, design, own, and manage telecommunications facilities throughout the world. WIA's members include carriers, infrastructure providers, and professional services firms.

² See Letter from Sade Dada, Wireless Infrastructure Association, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 17-79, WP Docket No. 17-84 (filed Sept. 10, 2018).

emphasized the importance for the FCC to correct the misinterpretations of Section 6409, consistent with the comments of American Tower Corp.³ and the Commission's previous infrastructure streamlining decisions.

WIA also answered questions relating to barriers to deployment including teeing up compound expansion and issues relating to 6409. WIA emphasized the importance of eliminating these impediments to provide the much-needed predictability and clarity to deploy wireless infrastructure across the nation. WIA urged the Commissions to use its authority to continue to streamline wireless infrastructure deployment.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter will be filed via ECFS and provided to each participant. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,



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³ See Letter from Mneesha Nahata, American Tower Corporation, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 17-79, (filed Aug. 10, 2018) (stating there is "no reasonable policy justification" for "divergent treatment between collocations and tower replacements given the Commission justified allowing compound expansions for replacement towers [to] facilitate additional collocations." In adopting the replacement tower exclusion, the Commission concluded that similar to collocations, strengthened replacement structures may lessen the need for duplicative deployments. Moreover, "the Commission found that allowing this modest compound expansion resulted in minimal risk because tower replacements had to meet the same substantial size limitations as collocation"...The Commission also concluded that "the risk is no greater in permitting the same modest up-to-30 foot expansion if it is needed to host additional antennas on the existing tower") at 6.