



**Sprint**

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October 26, 2017

**Via Electronic Submission**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., SW, Room TW-A325  
Washington, DC 20554

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

**Streamlining Deployment of Small Cell Infrastructure by Improving  
Wireless Facilities Siting Policies, WT Docket No. 16-421**

Dear Ms. Dortch:

On October 23, 2017, Charles McKee and I of Sprint Corporation met with the following Commission staff members: Suzanne Tetreault, Garnet Hanly, Deborah Broderson, Jeffrey Steinberg, Jill Springer, David Sieradzki, Mary Claire York, Linda Oliver, and Lee Martin (via phone).

Sprint emphasized the need to address regulatory barriers to the deployment of small cell infrastructure, including the escalating costs imposed by the current tribal review process. Sprint noted that the Commission has various means to lower the cost of reviews that do not impact eligible historic properties, including allowing costs only for consultation when an affected property is identified or by broadening exclusions. The Commission has authority to adopt exclusions under 36 C.F.R. § 800.3(a)(1) when the proposed action “does not have the potential to cause effects on historic properties.”

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Sprint also urged the Commission to clarify the interpretation of the term “tower” in the context of eligible historic properties. Specifically, Sprint noted that the replacement of an existing street light, utility pole, or traffic signal with one capable of supporting a small-cell collocation does not change the “primary purpose” of the structure as a street light, utility pole, or traffic signal. Accordingly, such a replacement pole is not a tower under NPA § II.A.14 and is not subject to the Commission’s rules under the National Historic Preservation Act and the NPA. Sprint urged the Commission to adopt reasonable interpretations of potentially ambiguous terms rather than impose the highest possible costs and burdens on wireless deployment, particularly in situations such as street light replacement where the potential impact on eligible historic properties is minimal. Sprint noted that the cost of tribal historic review for an individual site, in some cities, can approach the cost of the complete installation of the small cell system. Sprint used the attached photographs to illustrate the changes in small cell deployment.

Pursuant to Section 1.1206 of the Commission’s Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 592-2560.

Sincerely,

*/s/ Keith C. Buell*

Keith C. Buell  
Senior Counsel

cc: Suzanne Tetreault  
Garnet Hanly  
Deborah Broderson  
Jeffrey Steinberg  
Jill Springer  
David Sieradzki  
Mary Claire York  
Linda Oliver  
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