Mid-Ohio Regional
Planning Commission

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March 8, 2017

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

Subject: Comments on Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies (WT Docket No. 16-421)

Dear Secretary Dortch:

On behalf of the Mid-Ohio Regional Planning Commission (MORPC), I write in response to the Federal Communications Commissions' invitation to submit comments regarding streamlining deployment of small cell infrastructure by improving wireless facilities siting policies. MORPC is located in Columbus, Ohio and is comprised of more than 60 member local governments and regional organizations in a 15-county area. We welcome the tremendous benefits that new technologies can bring to Central Ohio.

As you determine how local land-use regulations or actions affect wireless infrastructure deployment, we offer the following comments in the three categories laid out in the public notice: Local Governments' Practices that "Prohibit or Have the Effect of Prohibiting" Provision of Service; Reasonable Period of Time for Review of Siting Applications; and Application Process Fees and Charges for Use of Rights-of-Way.

We desire and recognize the need to accommodate better wireless internet communication to meet the demand of consumers, meet the needs of safety services and further our efforts in economic development. Some of our members have a codified process for addressing installation of small cell wireless technology in the public right-of-way. This holds them accountable to the wireless companies and helps them by clarifying processes so they can better know what to expect when applying to install small cell technology within municipal boundaries. Although some of our members do not have codified processes in place, they recognize that other governments in our region do, and we can rely on their tried and true best practices to better streamline our communication with the companies.

**1. Local Governments' Practices that "Prohibit or Have the Effect of Prohibiting" Provision of Service**

We believe the coverage that the companies provide should be ubiquitous, providing complete coverage throughout communities, rather than support the potential 'redlining' wireless coverage based on demographics or economic characteristics. It is our desire to work with the wireless carriers and be proactive in identifying appropriate siting of small cell technology installations to ensure this complete, nondiscriminatory coverage. If everyone has a fair opportunity to take advantage of such technologies, we believe they can be of great economic benefit and transform our community.

William Murdock, AICP
Executive Director

Matt Greeson
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Vice Chair

Karen J. Angelou
Secretary

We also have the responsibility to protect our capital investments and fulfill government's responsibility of ensuring the health, safety, welfare and aesthetic qualities in our communities. Some communities have a robust asset inventory that details whether public infrastructure can support additional weight, wind load or other impacts that could have catastrophic results to public property. Assistance may be needed from the companies to make this determination.

**2. Reasonable Period of Time for Review of Siting Applications**

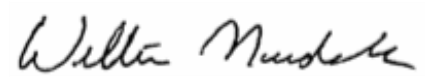
With the expected increase in wireless permits, we would expect that some communities would need to increase personnel to maintain or reduce the siting review period, or redirect existing personnel from other permitting functions such as building permits, and thereby adversely affect economic development.

**3. Application Processing Fees and Charges for Use of Rights-of-Way**

We appreciate the desire to establish a consistent and well defined fee structure so companies can plan expenses. However, this should not be mandated at a national level, as each state and community within have varying wages that affect processing costs. Under our state code, Ohio communities can only charge for actual and direct costs.

Thank you for the opportunity to comment on how small cell infrastructure affects Central Ohio communities. We look forward to continuing our efforts of advancing the deployment of new and emerging communications technologies in the best possible manner.

Kind regards,



William Murdock, AICP
Executive Director