



October 29, 2019

Chairman Ajit Pai
Commissioner Michael O'Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Commissioner Geoffrey Starks
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: WIA Petition for Rulemaking (WT Docket No. 19-250);
WIA Petition for Declaratory Ruling (WC Docket No. 17-84); and
CTIA Petition for Declaratory Ruling (RM-11849)**

Honorable Chair Pai and Commissioners O'Rielly, Carr, Rosenworcel and Starks:

On behalf of the City of Brea, thank you for allowing us to submit comments regarding the Wireless Infrastructure Association (WIA) and CTIA's petitions for Federal Communication Commission ("FCC") rulemaking and declaratory rulings. We strongly oppose any changes to the FCC's current rule that would result in further limitations on local control, and urge the FCC to reject these petitions.

The City of Brea strongly believes that local officials, government, and municipalities are best positioned to defend the interests of the people. As advocates for our residents, we are extremely alarmed by the misrepresentation of the role and utility of local ordinances in WIA and CTIA's petitions.

These proposed changes would further limit participation from the public and local governments in crucial decision-making procedures, modify the FCC's existing "substantial change" test, impose new procedural requirements on local decision-making, and alter the remedies for noncompliance with the FCC's existing shot clock regulations for eligible facilities requests.

These petitions also create undue burdens on cities like ours to gather information to disprove the misrepresentations. For example, the petitions ask for specific information on concealment elements in future modifications that could not possibly be known to

City Council	Christine Marick <i>Mayor</i>	Marty Simonoff <i>Mayor Pro Tem</i>	Cecilia Hupp <i>Council Member</i>	Glenn Parker <i>Council Member</i>	Steven Vargas <i>Council Member</i>
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local governments at the time of the petitions' publication, and could not reasonably be gathered within the comment period.

Given these reasons, the City strongly opposes the FCC's proposed rule.

I appreciate your consideration in this matter. If you need further information, please contact Liz Pharis at Lizp@cityofbrea.net, regarding these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christine Marick", with a long, sweeping horizontal line extending to the right.

Christine Marick
Mayor
City of Brea