



Wireless
Infrastructure
Association

March 14, 2019

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th St., 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; Reassessment of Federal Communications Commission Radio Frequency Exposure Limits and Policies, ET Docket No. 13-84; Proposed Changes in the Commission's Rules Regarding Human Exposure to Radio Frequency Electromagnetic Fields, ET Docket No. 03-137

Dear Ms. Dortch:

On March 12, 2019 and March 13, 2019 respectively, Jonathan Adelstein, President and CEO of the Wireless Infrastructure Association (WIA)¹ and the undersigned, met Federal Communications (FCC or "Commission") Commissioners Geoffrey Starks and Jessica Rosenworcel and their advisors William Davenport and Umair Javed.

In the meetings, consistent with previous filings, WIA discussed Commission policies to harmonize rules in relation to "compound expansions" for macrocellular installations in order to provide for more timely and efficient deployment of wireless service, including edge data computing and small cell facilities, as well as critical public safety facilities.² WIA further discussed the need to align localities' interpretations of Section 6409 with its

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).

statutory intent to avoid delays the wireless industry is currently experiencing when seeking to collocate equipment on existing facilities.³ Finally, WIA encouraged the FCC to complete its 2013 proceeding on radio frequency exposure policies in a concerted and fact-based manner.

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.