



May 23, 2019

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**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street SW  
Washington, D.C. 20554

Re: Notice of *Ex Parte* Presentation, WT Docket Nos. 17-79 and 19-71, and WC  
Docket No. 17-84

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC") rules, 47 C.F.R. § 1.1206, Crown Castle International Corp. ("Crown Castle"), by its attorneys, hereby submits this letter summarizing an *ex parte* meeting in the above-referenced dockets.

On May 21, 2019, Ken Simon, Monica Gambino, and Robert Millar of Crown Castle, accompanied by Roger Sherman of Waneta Strategies and the undersigned, met with Will Adams, Legal Advisor to Commissioner Carr.

The parties discussed the ongoing implementation and impact of the Declaratory Ruling and Third Report and Order ("September Order") in Dockets WT 17-79 and WC 17-84, with particular emphasis on those issues and jurisdictions where the September Order has had a positive effect in assisting with wireless facility deployment. The parties also talked about areas where challenges remain, including issues with timely access to electrical power, unreasonably high fees for application review, inappropriate consultant charges, and issues relating to Section 6409, including pad expansion and the scope of "concealment elements." The positions articulated were consistent with Crown Castle's public filings in the above-referenced dockets. The parties also briefly discussed the Commission's recent Over-the-Air Reception Devices ("OTARD") Notice of Proposed Rulemaking, and the potential benefits for 5G deployment that modification of the OTARD rule might present.

Please direct any questions to the undersigned.



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Respectfully Submitted,

*/s/ Joshua S. Turner*

Joshua S. Turner  
*Counsel to Crown Castle*

cc (via email): Will Adams