

1220 Augusta Drive, Suite 600

Houston, Texas 77057

June 7, 2019

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission

445 12th Street SW  
Washington, D.C. 20554

Re: *Amendment of Part 97 of the Commission’s Amateur Radio Service Rules to Reduce Interference and Add Transparency to Digital Data Communications,* RM – 11831*,* RM – 11708 and WT Docket No. 16-239

Dear Ms. Dortch:

Crown Castle International Corp. and its subsidiaries (“Crown Castle”) submit this *ex parte* letter in response to the Petition for Rulemaking (“Petition”) proposing to modify Section’s 97.221(c) and 97.309(a)(4) of the Federal Communications Commission’s (“FCC” or the “Commission”) rules. Crown Castle appreciates this opportunity to submit its views and encourages the FCC to adopt the proposals presented in RM – 11831.

Founded in 1994, Crown Castle is the country’s largest independent owner and operator of shared wireless infrastructure, with more than 40,000 towers, 65,000 small cell installations constructed or under contract, and over 70,000 miles of fiber. As a leader in the communications marketplace, Crown Castle is acutely aware of the need for skilled professional and technical workers to design and deploy networks that meet increasing consumer demands for connectivity. In fact, recent predictions have estimated that 20,000 technicians will be needed to meet current demand for network upgrades[[1]](#footnote-1).

In addition to building networks to meet consumer demand, Crown Castle is actively engaged in research involving evolving wireless technologies at several universities, including the University of Texas, Carnegie Mellon University and New York University. Crown Castle has also launched an internal program to recruit leading students at universities across the country and is working to recruit veterans of the US armed forces. Crown Castle is a board member of the Telecommunications Industry Registered Apprentice Program and serves on the National Wireless Safety Alliance. Both organizations are dedicated to training and certifying technicians to work in the communications industry. Crown Castle firmly believes that it is critical to our nation’s economic growth to continue to promote interest in the communications industry among US workers.  As such, efforts to engage youth in the interest of science, technology, engineering and mathematics (“STEM”) should be encouraged.

Traditionally, one way to engage youth is through the hobby of amateur radio. Many amateur radio hobbyists go on to pursue careers in wireless and communications engineering and we encourage the FCC to promote youth involvement in amateur radio to keep this tradition intact. The current rulemakings involving amateur radio are pivotal to this goal. Amateur radio enthusiasts learn essential data, RF engineering and computer skills by having the “space” to explore and examine radio transmissions. We ask the Commission to refrain from taking action on RM – 11708 and WT Docket No. 16-239 until issues presented in RM – 11803 can be resolved. We believe that adoption of the positions presented in the Petition will strengthen the Country’s efforts to promote STEM and we encourage the Commission to move forward with the rulemaking in RM - 11803.

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|  | Respectfully submitted,  CROWN CASTLE  INTERNATIONAL CORP.  By: /s/  Kenneth J. Simon  Senior Vice President and General Counsel  Monica Gambino  Vice President, Legal  1220 Augusta Drive, #600  Houston, Texas 77057  724-416-2000 |
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cc: Phil Kelley,

Senior Vice President - Corporate Development and Strategy

Crown Castle International Corp.

1. Comments of Commissioner Brendan Carr, https://docs.fcc.gov/public/attachments/DOC-356713A1.pdf. [↑](#footnote-ref-1)