



June 12, 2019

VIA ELECTRONIC FILING

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

RE: GN Docket No. 19-71, *Updating the Commission's Rule for Over-the-Air Reception Devices*

Dear Secretary Dortch:

The Washington Association of Telecommunications Officers and Advisors ("WATOA") submits these reply comments on the above-captioned action. WATOA's membership includes local government officials and staff members from across Washington whose responsibility it is to develop and administer telecommunications policy for their communities. Our members include cities and counties representing 93% of the state's population, with 2,402,615 city residents and 4,386,743 county residents.

We file these reply comment in **support of the comments** submitted on June 3, 2019, by The National Association of Telecommunications Officers and Advisors ("NATOA"), the National League of Cities ("NLC"), and the National Association of Regional Councils ("NARC"), (the "Municipal Organizations") and in opposition to the Commission's proposed OTARD rule changes. As articulated in the Municipal Organizations' comments, the Commission lacks the authority to implement the proposed rule that would intrude on the local zoning authority of our member cities and counties.

We also support the original purpose of OTARD to facilitate antenna placement to allow a resident on the premises to gain access to video and broadband internet service. As proposed, the Commission's rule modernization would transform OTARD from this purpose of being an end-user *consumer protection* tool, into being a *wireless industry protection* tool – allowing companies to obtain access for their equipment on private property regardless of whether it is to provide services *for a resident* on the premises. We oppose this FCC rule change and its impact of undermining legitimate local zoning regulation and the rights of building owners, for the benefit of the wireless industry.

Respectfully submitted,


George Geyer
WATOA President