



June 15, 2018

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Ex Parte

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

Re: Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies, ET Docket No. 13-84; Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields, ET Docket No. 03-137

Dear Ms. Dortch:

On June 13, Tamara Preiss and Andy Lachance of Verizon met with Julius Knapp, Bruce Romano, Aspasia Paroutsas, Ed Mantiply, Walter Johnston, and (by phone) Martin Doczkat of the Office of Engineering and Technology (OET) to discuss the pending Further Notice of Proposed Rulemaking in the above-captioned proceeding.¹

We discussed the need for the Commission to adopt safe harbors with respect to carrier efforts to restrict access to and notify the public about the presence of radiofrequency emissions (RFE) on rooftops and at other accessible wireless transmitter locations.² Verizon remains committed to – and in fact does operate – safe and effective transmitters, but there are limits to our ability to control the actions of third parties. A flexible approach to rooftop mitigation efforts similar to the approach taken in Verizon's consent decree³ would be effective, while still taking into account that rooftop situations may vary and landlords sometimes resist carrier efforts to restrict access. Verizon's experience with this approach should lay to rest any concerns that a flexible safe harbor will leave workers or the public unaware of the radiofrequency environment at accessible locations. Verizon reported in October 2016 that it was successful in either

¹ *Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies*, ET Docket No. 13-84; *Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*, ET Docket No. 03-137, Further Notice of Proposed Rulemaking, 28 FCC Rcd 3498 (2013).

² *Reassessment of Federal Communications Commission Radiofrequency Exposure Limits and Policies*, ET Docket No. 13-84; *Proposed Changes in the Commission's Rules Regarding Human Exposure to Radiofrequency Electromagnetic Fields*, ET Docket No. 03-137, Comments of Verizon and Verizon Wireless (filed September 3, 2013), at 10-15.

³ See *Cellco Partnership d/b/a Verizon Wireless*, Order, 29 FCC Rcd 4789 (2014).

Ms. Marlene H. Dortch

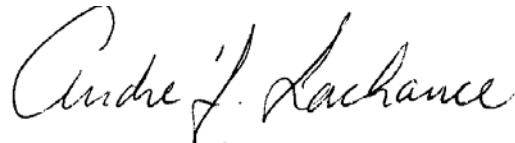
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restricting access to the rooftop or placing physical barriers around the areas exceeding the general population RFE limit at 99.96 percent of its thousands of rooftop locations. And even in the 0.04 percent of locations where it could not, multiple signs and other measures are in place to warn against approaching the transmitter sites.

We also discussed carrier inspections of accessible transmitter sites producing emissions over the general population RFE limit. We asked the Commission to clarify that “routine environmental evaluation,” as used in Section 1.1307(b) of the Commission’s Rules, means that carriers need to visit sites and take measurements of the RFE produced at the sites only when parameters at the site that affect the RF environment change.⁴ We proposed that any additional periodic inspections to ensure that carrier mitigation measures (such as signs and physical barriers) remain in place and in good condition should not be required more frequently than every three years.

Sincerely,

A handwritten signature in cursive script that reads "Andre J. Lachance".

cc: (via email)
Julius Knapp
Bruce Romano
Aspasia Paroutsas
Ed Mantiplay
Walter Johnston
Martin Doczkat

⁴ 47 C.F.R. § 1.1307(b).