



Preserving America's Heritage

June 15, 2017

Honorable Ajit Pai
Chairman
Federal Communications Commission
Washington, DC 20554

Dear Chairman Pai,

The Advisory Council on Historic Preservation (ACHP) is responding to the Federal Communications Commission's (FCC's) Notice of Proposed Rulemaking (NPRM) and Notice of Inquiry (WT Docket No. 17-79 and FCC 17-38 respectively), *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment*, published in the Federal Register on May 10, 2017. Our response augments the ACHP's letter of April 13, 2017, in which Chairman Donaldson expressed concerns that the draft NPRM was premature.

The ACHP recognizes and appreciates FCC's ongoing outreach to State Historic Preservation Officers, Indian tribes, and the ACHP to discuss questions raised in the NPRM and NOI; however, we remain concerned that their views were not solicited prior to the issuance of the NPRM and did not appear to adequately inform its content. Furthermore, the ACHP notes that data which might serve to quantify and accurately describe the successes and challenges FCC may be encountering in carrying out environmental reviews has not been systematically and routinely gathered by FCC. We, therefore, urge that it undertake an effort to compile and review such information before concluding what improvements might be needed.

The ACHP, along with the National Conference of State Historic Preservation Officers, National Association of Tribal Historic Preservation Officers, and individual State and Tribal Historic Preservation Officers, have a long history of collaboration with FCC and a commitment to develop innovative compliance solutions that serve to deliver much needed telecommunications services to the American people while not causing an undue burden to the protection of historic properties. Few agencies have developed such efficient, comprehensive, and innovative systems for environmental compliance as FCC. Accordingly, the ACHP urges FCC to continue in the spirit of collaboration with these partners to refine and improve these systems, and avoid rolling back the successes that have been achieved under them. We would point to our recently issued Program Comment on Communications Projects on Federal Land and Properties as evidence of the fruits of this collaboration.

The ACHP looks forward to assisting FCC in addressing barriers to the deployment of broadband infrastructure. Should you want to meet to discuss our response to the NPRM and NOI, please feel free to contact me at jfowler@achp.gov or by telephone at 202-517-0191.

Sincerely,

(for) John M. Fowler
Executive Director

ADVISORY COUNCIL ON HISTORIC PRESERVATION

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