



June 17, 2019

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

Re: Updating the Commission's Rule for Over-the-Air Reception Devices
("OTARD"); WT Docket No. 19-71

Dear Ms. Dortch:

OUTFRONT Media Inc. ("OUTFRONT") supports the revisions of the OTARD rule proposed in the Commission's *OTARD NPRM*.¹ As discussed below, the proposed revisions would spur the rapid deployment of fixed wireless 5G broadband services to consumers and businesses throughout the country.

OUTFRONT is one of the largest providers of advertising space on out-of-home advertising structures and sites across the U.S. Our inventory consists of billboard displays primarily located along highways and roadways, transit advertising and related street furniture displays, and advertising structures located on or near the campuses of U.S. colleges, universities, and other educational institutions. We also offer commercial access to our structures and sites to many wireless providers throughout the country. This access offers wireless providers significant siting alternatives by which to plan and build their networks in a cost-efficient manner. Wireless providers also carry the traffic to and from those antennas to upstream capacity co-located at the OUTFRONT sites, such as fiber and high-capacity microwave facilities. In some cases, the use of OUTFRONT's structures and sites enable wireless providers to offer broadband services to communities that are not adequately served through the use of existing wireless towers.

As the wireless industry shifts toward the denser networks using small cells, it requires a greater number of sites to meet today's growing demands for broadband and to deploy the next generation of 5G networks. Service providers often face uncertain delays and costs due to local

¹ In the Matter of Updating the Commission's Rule for Over-the-Air Reception Devices, Notice of Proposed Rulemaking, FCC 19-36, WT Docket No. 19-71 (rel. April 12, 2019) ("*OTARD NPRM*").

regulatory or property owner approvals which are required prior to deployment of antennas and related equipment on associated equipment. As a result, wireless operators in some areas lack the ability to deploy networks efficiently by using all available sites. The proposed revisions to the OTARD rule, however, would significantly improve the ability of fixed wireless service providers to plan and operate hub and relay antenna networks efficiently and at lower costs to a larger service area. Extending the OTARD protections in this manner would also enhance competition between service providers, resulting in lower-cost and more robust broadband services for U.S. consumers, educational institutions, and businesses.

Finally, we agree with the commenters requesting a limited modification of the rule to ensure that the OTARD protections apply to *all* fixed wireless OTARD antennas located on any structures or sites, not just those located at the property owned or leased by the provider's customer. The record in this proceeding reflects that fixed wireless providers in many areas of the country have very few cost-effective site choices, or no feasible choices at all, to build and operate cost-efficient and robust networks. To address this deployment barrier, the Commission should extend the OTARD protections to antennas located on billboards and other structures in order for providers to connect with their customers directly from those structures and/or to connect their hub and relay networks efficiently with their upstream capacity facilities and base stations co-located at these structures. This extension of the OTARD protections would greatly benefit customers of broadband and 5G services by avoiding potential upstream capacity "bottlenecks" from hub and relay networks without any offsetting burdens on municipalities or property owners.

For the foregoing reasons, OUTFRONT respectfully submits that the revisions to the OTARD rule discussed above would serve the broadband public interest goals of Congress and the Commission.

Sincerely,



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