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July 18, 2018

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12th St S.W.  
Washington, D.C. 20554

Re: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79;  
Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84;  
Streamlining Deployment of Small Cell Infrastructure, WT Docket No. 16-421;  
Accelerating Broadband Deployment, Broadband Deployment Advisory Committee, GN Docket No. 17-83

Dear Ms. Dortch:

The Smart Communities and Special Districts Coalition (“Coalition”) submits this letter to highlight a recent pronouncement by Sprint of the extraordinary rate of outdoor small cell deployments that company has achieved in just the last quarter. This announcement stands in stark contrast to generic industry arguments and Sprint filings to the Commission that deployment is being inhibited by local governments and public agencies.

Sprint published a blog post on July 17, 2018 highlighting its success in deploying small cells.<sup>1</sup> Sprint celebrated that it “deployed more outdoor small cells in our 2017 fiscal fourth quarter than we have in the previous two years combined!”<sup>2</sup> This success stands in contrast to Sprint’s previous claims that local governments raise major barriers to infrastructure deployment and that “[w]ithout removal of all [these] barriers, rapid, economical infrastructure deployment is threatened.”<sup>3</sup> Nevertheless, Sprint indicates its successes thus far (without Commission action) are only the beginning: “...we’ll continue to invest, expanding and extending our use of large traditional cell towers, as well as state-of-the-art small cells.”<sup>4</sup>

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<sup>1</sup> Scott Santi, *Densifying the Sprint Network with Tiny, Mighty Small Cells*, Sprint Newsroom (Jul. 17, 2018) (“Sprint Blog Post”), available at <http://newsroom.sprint.com/tiny-mighty-small-cells.htm>.

<sup>2</sup> *Id.*

<sup>3</sup> Comments of Sprint, WT Docket No. 17-79, at 11 (Jun. 15, 2017).

<sup>4</sup> Sprint Blog Post.



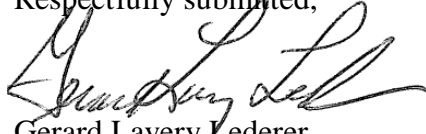
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As the Coalition has consistently demonstrated,<sup>5</sup> “if local policies rose to the level of prohibitions” (as is required by the Communications Act to justify Commission action)<sup>6</sup> “this level of deployment simply would not be happening.”<sup>7</sup> The success of Sprint and other wireless carriers in deploying wireless infrastructure deserves praise, and local governments nationwide continue to work in partnership with Sprint and other carriers to streamline deployment. The assertion placed before the Commission, however, that local governments are standing in the way simply does not hold up in light of that success.

Pursuant to Section 1.1206(b) of the Commission’s rules, a copy of this letter is being electronically filed in the above-captioned proceedings, and distributed via email to the individuals listed below. Please do not hesitate to contact me with any concerns.

Respectfully submitted,



Gerard Lavery Lederer  
of BEST BEST & KRIEGER LLP

cc: Chairman Ajit Pai  
Commissioner Michael O’Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
Rachel Bender  
Erin McGrath  
Will Adams  
Umair Javed  
Garnet Hanly  
Suzanne Tetreault

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<sup>5</sup> See Reply Comments of the Smart Communities & Special Districts Coalition, WT Docket No. 17-79, WC Docket No. 17-84, at 5-14 (Jul. 17, 2017) (“Smart Communities Reply Comments”).

<sup>6</sup> See 47 U.S.C. § 332(c)(7)(B)(i)(II).

<sup>7</sup> Smart Communities Reply Comments at 9; see also Comments of the Smart Communities and Special Districts Coalition, WT Docket No. 17-79, at 10-13 (Jun. 15, 2017).