City of Portland Office of Management and Finance
Bureau of Revenue and Financial Services, Revenue Division

Office for Community Technology

Broadband & Communications Policy ◢ Cable Regulation & Consumer Protection ◢ Utility Franchises, Licenses & Wireless

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July 26, 2018

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW Washington, DC 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:

Portland, as the largest city in the State of Oregon, understands and welcomes the benefits that 5G can bring to our residents and businesses.[1] Portland is also prepared to welcome the deployment of 5G infrastructure in our right-of-way. We make this filing, however, to introduce facts into this proceeding, which to date has been driven by hyperbole, by sharing with the Commission Portland's experience with a small cell pilot program and to show the industry's push to preempt Portland's management of its largest asset is unwarranted.

Small Cell Pilot Program – Errors and Delays Caused by Wireless Industry

From June 2014 to October 2017, the City of Portland, through the Office for Community Technology, operated a small cell pilot program for attachments to investor-owned utility poles. Any entity could participate, but only Verizon and Crown Castle (doing business in Portland as NewPath Networks) submitted applications. The City approved 66 applications, but not without significant additional work by city-staff to remedy easily-preventable applicant errors. Among the common errors were:

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[1] The City of Portland has been very active in the above captioned dockets as a member of the Smart Communities and Special Districts Coalition. In every one of the Coalition's filings, Portland has required a declaration of its support for 5G deployment, but that such deployment be sensitive to the needs and interests of the local community. *See e.g.* Comments of the Smart Communities & Special Districts Coalition, WT Docket No. 17-79, WC Docket No. 17-84, (June 15, 2017) ("Smart Communities Comments").

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- Failure to submit the required application fee (or any application fee);
- Mathematical errors calculating total equipment volume;
- Failure to provide required documentation (i.e. photo sims or authorization from the pole owner to use the pole); and
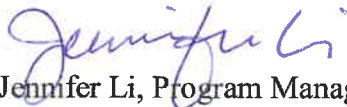- Failure to sign the application.

City staff time was spent working with carriers to correct basic application deficiencies. It is not that Portland is expecting all applications to be perfect, but we were surprised that not a single application was free from an easily-preventable error. We must assume that Portland's experience was not unique and that if the industry truly is experiencing delays, those delays have been likely self-inflicted.

Portland is committed to ensuring that the benefits of 5G are available to all of our residents and businesses. In an effort to meet this goal, City leadership has:
- Directed staff to analyze the data collected during the pilot program for future improvements in process and application format;
- Retained an expert to draft a Wireless Master Plan; and
- Initiated a program to expedite the deployment of small cells on city-owned poles.

Since 2014, the City has demonstrated its willingness and ability to deploy small cells. We urge the Commission to carefully assess industry's claims that local governments are barriers to 5G deployment.

Sincerely,

Jennifer Li, Program Manager
Office for Community Technology
City of Portland

Cc: Portland Congressional delegation