

# Attachment D

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**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

CROWN CASTLE FIBER LLC,

*Complainant,*

v.

COMMONWEALTH EDISON COMPANY,

*Respondent.*

Proceeding Number 19-169  
Bureau ID Number EB-19-MD-004

Proceeding Number 19-170  
Bureau ID Number EB-19-MD-005

**DECLARATION OF DONALD RUSSELL**

I, Donald Russell, affirm and declare under the penalty of perjury as follows:

1. I am a Regional Director of Implementation for Crown Castle. I make this declaration in support of Crown Castle Fiber LLC's ("Crown Castle") Reply in the above-captioned cases.

2. I have been employed in the telecommunications industry for 22 years with extensive experience in both wireless and wireline telecommunications services. Specifically, I have been employed with Crown Castle for the last five years. Prior to that, I worked for AT&T in construction and engineering roles in designing and building telecommunications networks for 17 years.

3. In my role as Regional Director of Implementation for Crown Castle, I have personal knowledge and experience with Crown Castle's service offerings using its "Distributed Antenna System" ("DAS") networks, which are also known as "Small Cell" networks, including the networks being deployed in the Chicago area. I also have personal knowledge of Crown Castle's proposed service offerings in the Chicago area.

4. Crown Castle is a provider of telecommunications services around the country, including in Illinois. It offers a diverse suite of telecommunications services to various segments of the market, including to enterprise customers and to wireless carriers, for a fee. Crown Castle's service offerings include transport of customer communications from customer points of presence to various other locations depending on the customer's choice and the specific service involved. This is true both in the case of enterprise customers and wireless provider customers. In both cases, Crown Castle is providing transport of the customer's communications among points of the customer's choosing, without alteration.

**A. Crown Castle's Service Over DAS Networks**

5. In one of Crown Castle's offerings, Crown Castle provides transport service using a DAS network, which can also be known as a "Small Cell" network. Over a DAS/Small Cell network, Crown Castle's telecommunications service consists of providing transport of Crown Castle's customers' communications (both voice and data) between points designated by the customer without alteration of the content of the communications. Crown Castle calls this offering "RF Transport Service."

6. For RF Transport Service, Crown Castle's customers are typically providers of retail wireless telecommunications services.

7. RF Transport Service involves a communication signal handed off from Crown Castle's wireless carrier customer to Crown Castle that Crown Castle then transports over its fiber optic facilities to a distant point designated by the customer. This handoff and transport takes place at one of two locations. On one end, it can be at and through equipment configurations called "Nodes" that are located on utility or streetlight poles located in the public rights of way or in private utility easements. The typical "Node" in Crown Castle's network consists of electronic equipment that converts Radio Frequency (*i.e.*, "RF" or wireless) format

communications to light signals carried over Crown Castle's fiber optic lines. The equipment comprising a typical Node in Crown Castle's network includes a small, low-power antenna, laser, and amplifier equipment for the conversion of RF signals to optical signals (or from optical to RF), that is connected to the antenna, fiber optic lines, and associated equipment (such as power supplies).

8. Crown Castle transports its customers' communications from a Node through Crown Castle's fiber optic network to a distant point that is typically, but not always, an aggregation point called a "Hub." The Hub is a central location that contains such equipment as routers, switches, and signal conversion equipment. The Hub is typically installed in a building located on private property. In the case of communications starting at the Node, Crown Castle hands the communication signal back to its customer at the Hub, where the communications signal may be, for example, interconnected with the public telephone network.

9. All wireless transmissions are performed by Crown Castle's customers, who control and are responsible for their licensed spectrum. Although Crown Castle's service and network incorporates wireless reception devices, Crown Castle is not a wireless or commercial mobile radio service ("CMRS") provider.

10. Crown Castle also transports signals for its customers from the Hub out to Nodes, and in that case the process simply goes in the other direction.

11. Although Crown Castle does not, itself, provide wireless services, the antennas that are part of the Node are incorporated into and are an integral part of Crown Castle's network and RF Transport service offering.

**B. Crown Castle's Services To Enterprise Customers**

12. Crown Castle's offerings are not limited to service between Nodes and Hubs. Crown Castle also offers other telecommunications services to enterprise customers, such as

large or medium sized business, schools, hospitals, and government, among others. In those cases, Crown Castle offers a variety of point-to-point telecommunications services between other customer locations.

13. To efficiently use its networks, Crown Castle frequently uses the same fiber optic bundles to provide both RF Transport and also transport for enterprise customers. Basically, when Crown Castle installs a network, it installs a bundle of fibers, so that it can use the fibers to serve multiple different companies using that bundle. This is common industry practice.

14. However, Crown Castle has also deployed fiber optic lines that are not related to a DAS network in order to provide service to enterprise customers, and that is the case in a significant part of its Chicago area network that is being deployed in part on ComEd poles.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

By: Donald Russell

Dated: August 1, 2019