



August 13, 2018

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554

Re: Ex Parte Communication
Accelerating Wireless Broadband Deployment by Removing Barriers to
Infrastructure Investment, WT Docket No. 17-79

Dear Ms. Dortch:

Sprint continues to support the Federal Communications Commission's efforts to reduce barriers to the deployment of wireless infrastructure. In its initial comments in a related proceeding, Sprint discussed the negative effects of excessively high pole attachment rates and access to municipal rights-of-way, as well as the time-consuming delays wireless carriers face when deploying small cells and densifying their wireless networks.¹ These costs and delays have real world impacts. Below, Sprint outlines one example of the consequences these barriers have on on-going deployments.

The adjacent jurisdictions of the City of Los Angeles and Los Angeles County have dramatically different fees and processes. These differences have had a direct effect on Sprint's small cell deployment in these two jurisdictions. In the City of Los Angeles, the entire application process from start to finish is approximately six months. This includes obtaining a site reservation and building permit. The total application fee per site is \$350. In contrast, Los Angeles County's process is protracted and costly. The entire process, which includes many sequential steps, takes a year or more and imposes application fees of \$9,820. Moreover, these fees are only the upfront, one-time costs. The annual recurring fees vary based on who owns the poles. Under California law, Sprint does not pay any right-of-way access fees for its own poles but does pay rent to the pole owner, whether it's the local government, an electric company, or a wireline telephone company.

Sprint began its small cell planning in these areas more than two years ago by identifying gaps in its network capacity and coverage that would benefit from small cell installation. These locations were identified without consideration of the permitting costs or timelines. But the deployment process certainly takes into account these factors.

Sprint has deployed more than 500 small cells in the City of Los Angeles that are now active, which is more than 1/3 the total number planned. But due to the higher costs and longer

¹ In the Matter of Streamlining Deployment of Small Cell Infrastructure by Improving Wireless Facilities Siting Policies; Mobilite LLC Petition for Declaratory Ruling, Comments of Sprint Corporation, WT Docket No. 16-421 (March 8, 2017).

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delays in Los Angeles County, Sprint has yet to activate a single small cell in that jurisdiction even though Sprint planned many fewer total small cells. As a result, service in the City of Los Angeles has been substantially improved, while there has been no corresponding benefits to Los Angeles County.

This is only one example of the disparities that wireless carriers face as they attempt to develop networks with the speed and capacity that consumers demand. Without direction from the FCC, carriers will be required to continue these patch-work deployments, diverting resources to those areas that welcome increased broadband speeds from those areas that view increased connectivity as a revenue opportunity.

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced docket. If you have any questions, please feel free to contact me at (703) 592-2560.

Sincerely,

/s/ Keith C. Buell

Keith C. Buell
Senior Counsel