



September 6, 2018

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Mayor
Dr. Jim Gardner

Mayor Pro Tem
Leah Basile

Council Members
Tom Cagley
Dwight Robinson
Scott Voigts

City Manager
Debra DeBruhl Rose

VIA ELECTRONIC FILING

Re: Ex Parte Presentation, Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barrier to Infrastructure Investment, WC Docket No. 17-84; Streamlining Deployment of Small Cell Infrastructure, WT Docket No. 16-421

Dear Ms. Dortch:

The City of Lake Forest, California, submits this letter in response to an upcoming public hearing regarding telecommunications infrastructure. The City respectfully requests that the commission deny telecommunications organizations' recent requests to circumvent local entitlement processes to expedite placement of communications facilities in the public right-of-way.

Current law allows local agencies autonomy in processing applications to locate wireless communications facilities in the public right-of-way. Additionally, current law allows the City to negotiate fair market value lease rates for public infrastructure. Granting these requests would allow private entities to encroach on legitimate local governmental regulation and diminish the City's ability to collect fair market lease rates on behalf of the taxpayers.

The City is not opposed to new technology and generally understands the telecommunications industry's attempts to densify networks through addition of new communications facilities. However, ruling in favor of these organizations would potentially impede upon local agencies' ability to regulate these facilities.



For these reasons, the City of Lake Forest is respectfully opposed to granting the telecommunications organizations' recent requests. Should you have any questions regarding the City's position, please contact Louie Lacasella, Assistant to the City Manager, at (949) 461-3537, or by email to llacasella@lakeforestca.gov.

Sincerely,

CITY OF LAKE FOREST



Dr. Jim Gardner
Mayor

cc: The Honorable Dianne Feinstein, United States Senator, California
The Honorable Kamala Harris, United States Senator, California
The Honorable Mimi Walters, United States Representative, 45th District
The Honorable John Mooolach, Representative, 37th District
The Honorable Steven Choi, Representative, 68th District
Lake Forest City Council
The League of California Cities
The Association of California Cities – Orange County