



Wireless
Infrastructure
Association

September 8, 2017

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte* Communication, Streamlining Deployment of Small Cell Infrastructure, WT Docket No. 16-421; 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; Amendment of Part 90 of the Commission's Rules to Improve Access to Private Land Mobile Radio Spectrum, WP Docket No. 16-261; Broadband Deployment Advisory Committee, GN Docket No. 17-83

Dear Ms. Dortch:

On September 6, 2017, Sade Oshinubi, Van Bloys, and the undersigned of the Wireless Infrastructure Association (WIA)¹ met with Kevin Holmes of Commissioner Carr's office; also on September 6, Sade Oshinubi, Farhan Chughtai, and the undersigned of WIA met with Daudeline Meme of Commissioner Clyburn's office. On September 8, Sade Oshinubi, Van Bloys, and the undersigned of WIA met with Rachael Bender of Chairman Pai's office.

In the meetings, consistent with its comments in the above-captioned proceedings, WIA emphasized the importance of the Federal Communications Commission's (FCC or Commission) efforts to reduce regulatory barriers to wireless infrastructure deployment. WIA encouraged the FCC to streamline the siting process to enhance capacity on 4G networks and spur the deployment of next-generation 5G networks through these proceedings as well as through the Broadband Deployment Advisory Committee.

¹ The Wireless Infrastructure Association (WIA) is the principal organization representing companies that build, design, own, and manage telecommunications facilities throughout the world. WIA's members include carriers, infrastructure providers, and professional services firms.

WIA asked the FCC to reduce siting delay using its existing statutory authority under Sections 253 and 332 of the Telecommunications Act. To provide the connectivity necessary to meet exponentially increasing data demands, WIA discussed expediting the deployment of small cell infrastructure within public rights-of-way so long as the equipment met defined height and volume limitations to maintain a responsible and transparent foundation in infrastructure deployment.² WIA asked the FCC to consider clarifying the process for upgrading sites using Section 6409(a) Eligible Facilities Requests based on misinterpretations of previously-issued Commission rules. WIA also underscored the importance of a modernized pole attachment process to small cell deployment, including a 180-day shot clock for resolving complaints and access to utility-owned light poles.

WIA also encouraged the FCC to streamline historic preservation and environmental review processes. WIA asked the FCC to swiftly clear Twilight Towers to further competitive broadband offerings and offer more opportunities for FirstNet collocations. Further, WIA sought adoption of finite timelines to reduce delays along with relief and standardization of Tribal fees, and modernization of the Tower Construction Notification System (TCNS). WIA also urged the FCC to eliminate the need to undergo additional historic preservation review for compound expansion within certain parameters.

Finally, WIA explained the importance of efforts to improve access to 800 MHz Expansion Band (EB) and Guard Band (GB) channels through open access policies that will maximize use of this spectrum for the benefit of the public.³

² See Comments of the Wireless Infrastructure Association, WT Docket No. 17-79, WC Docket No. 17-84 (filed Jun. 15, 2017) at 5 n.16 (describing a volume and height-based definition for “small wireless facility”).

³ Reply Comments of the Wireless Infrastructure Association, WP Docket No. 16-261 (filed Dec. 22, 2016) (emphasizing that the Commission should encourage competition in the EB and GB channels by continuing policies that do not give incumbent operators priority access to available EB or GB channels, which could bar new entrants and deter innovation).

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter will be filed via ECFS and provided to each participant. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Zachary Champ".

D. Zachary Champ
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cc: Daudeline Meme
Kevin Holmes
Rachael Bender