



September 8, 2017

**VIA ELECTRONIC FILING**

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

**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 Barriers to Infrastructure Investment*, WC Docket No. 17-84; *Streamlining Deployment of Small Cell Infrastructure*, WT Docket No. 16-421

On September 6, 2017, Scott Bergmann and Kara Romagnino Graves of CTIA met with Daudeline Meme of the Office of Commissioner Mignon Clyburn to discuss the above-referenced proceedings.

During the meeting, CTIA highlighted the importance of modernized siting policies at the federal, state, and local levels and their key role helping to ensure the U.S.'s 5G leadership. CTIA stressed that timely action across all levels of government will be essential to creating capacity for today's 4G LTE networks and building out the nation's next-generation wireless networks. Consistent with prior advocacy, and with the attached presentation, CTIA urged the Commission to modernize local review of wireless infrastructure applications, clarify actions that prohibit or have the effect of prohibiting wireless service, and ensure that application fees and fees for use of public rights of way are cost-based, fair, and reasonable.<sup>1</sup>

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<sup>1</sup> See, e.g., Comments of CTIA, WT Docket No. 17-79, WC Docket No. 17-84 (filed June 15, 2017); Reply Comments of CTIA, WT Docket No. 17-79, WC Docket No. 17-84 (filed July 17, 2017); Comments of CTIA, WT Docket No. 16-421 (filed Mar. 8, 2017); Reply Comments of CTIA, WT Docket No. 16-421 (filed Apr. 7, 2017).



Pursuant to Section 1.1206(b) of the Commission's rules, a copy of this letter is being electronically submitted into the record of these proceedings and provided to the Commission participant. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

/s/ Scott K. Bergmann

Scott K. Bergmann  
Vice President, Regulatory Affairs  
CTIA

Attachment

cc: Daudeline Meme

ctia Everything™  
Wireless

# Infrastructure



# The Wireless Industry Powers Our Economy

CREATING NEW AMERICAN JOBS AND OPPORTUNITIES

“  
The wireless industry  
adds \$400B annually  
to our economy.  
”

The Brattle Group  
MAY 2015

4.6 M  
JOBS

American jobs rely directly or indirectly on the wireless industry

JOB  
MULTIPLIER

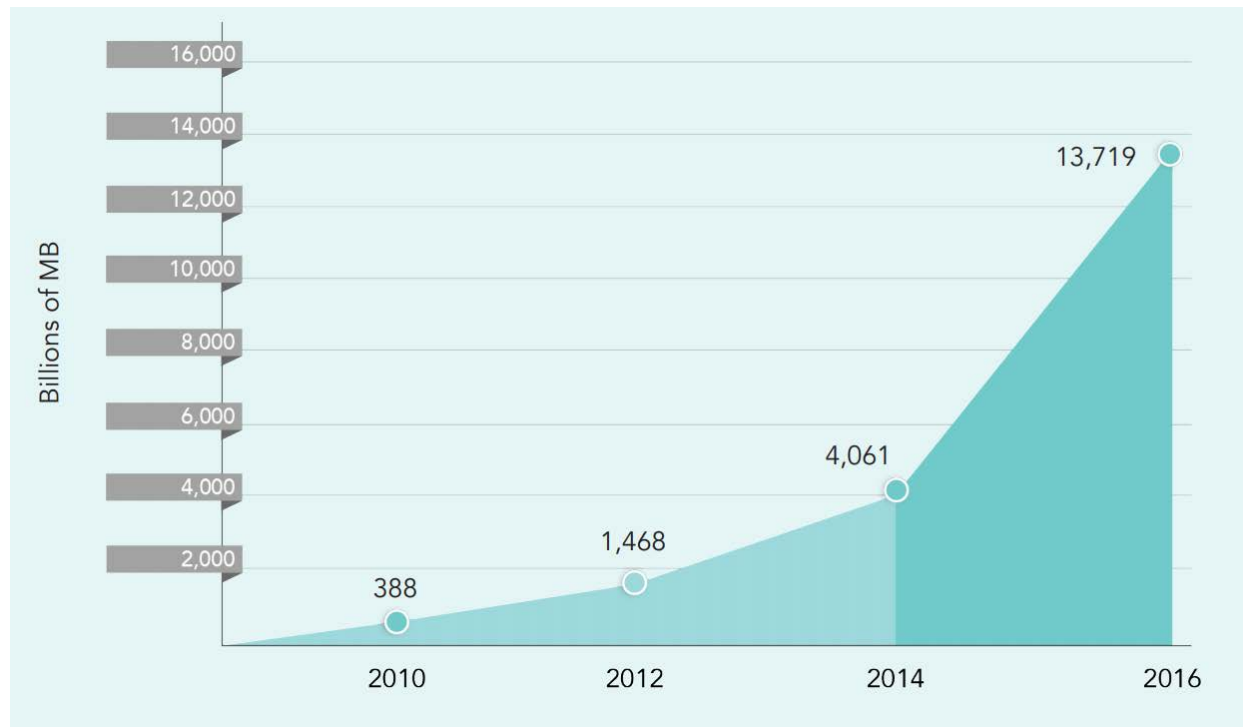
6.5 jobs are created every time the wireless industry employs **one** person

44%  
MORE PAY

Wireless jobs pay better than the average job

# Americans Love Wireless

MORE EVERY YEAR



## 3 OUT OF 4

Americans believe mobile is more important to their lives than it was 5 years ago.



Americans used

## 35x MORE

mobile data in 2016 than they did in 2010.

# 5G is the Answer to Our Growing Data Needs

4G MADE OUR NETWORKS FASTER AND OUR LIVES EASIER  
5G WILL BE A MASSIVE LEAP



# 5G Opportunity

ACCENTURE FORECASTS JOBS AND GROWTH



**\$275 BILLION**

New Wireless Investment



**3 MILLION**

New Jobs



**\$500 BILLION**

Contribution to GDP



# Small Cells

## WHAT'S NEXT

New opportunities: Networks can now be extended on common structures like street lights and utility poles

300K pizza-box sized small cells needed in next 3-4 years









# Key Reforms to Unlock Wireless Investment & Innovation



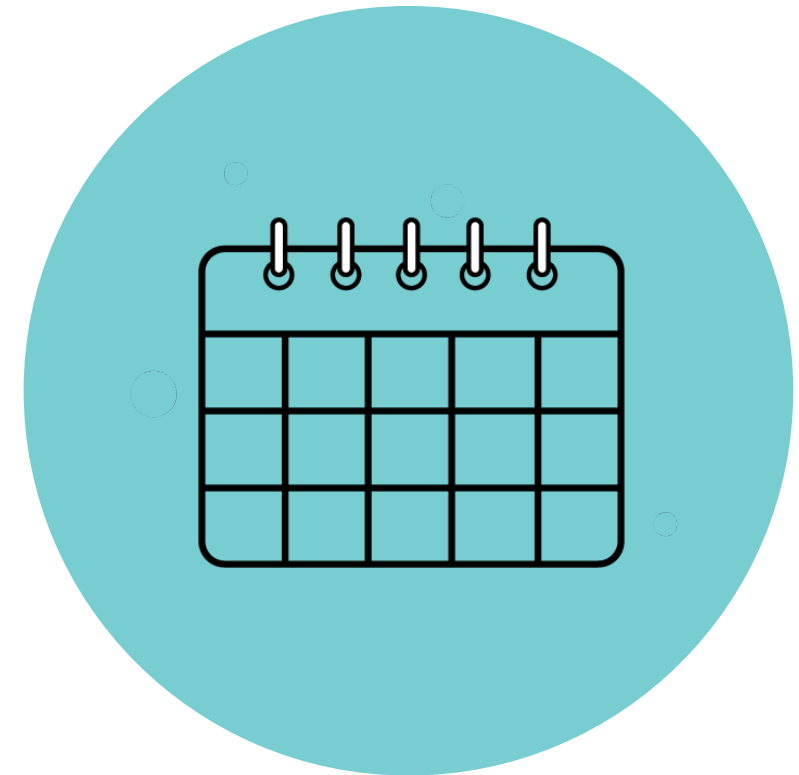
# Adopt Reasonable Timelines

SHOT CLOCKS REDUCE DELAYS & PROVIDE CERTAINTY

Adopt 60-day shot clock for all collocations

Adopt 90-day shot clock for all new facilities

Clarify that shot clocks apply to wireless in ROWs and to the entire local review process



# Implement Enforceable Remedies

EFFECTIVE SHOT CLOCK ENFORCEMENT IS KEY

Adopt “deemed granted” remedy under Section 332(c)(7) to include all facilities applications when localities fail to act in a reasonable time—similar to Section 6409 remedy

The FCC has the necessary statutory authority to do so



# Simplify the Application Process

EASE THE BURDEN ON LOCAL GOVERNMENTS AND PROVIDERS



Allow providers to submit batch applications for similar facilities

Confirm same shot clocks apply to batch applications for similar facilities

# Resolve Statutory Uncertainty

DIVERGENT COURT DECISIONS HINDER CONGRESSIONAL  
GOAL OF PROMOTING NETWORK DEPLOYMENT

Adopt declaratory ruling to interpret scope  
of Sections 253 and 332

Standard should be any state or local law  
or practice that poses a substantial  
barrier to timely broadband facility  
deployment runs afoul of Sections 253  
and 332



# Promote Deployment Using 253 & 332

DECLARE THESE PRACTICES ARE UNLAWFUL

- 1 Express and de facto moratoria
- 2 Undergrounding requirements
- 3 Denials of access to muni-owned facilities in ROWs
- 4 Requirements that providers demonstrate a need for service or a specific facility, type of facility, or technology
- 5 Minimum distance separations between sites
- 6 Requirements that discriminate among providers
- 7 Unbounded subjective aesthetic requirements
- 8 Requirements that providers use municipal-owned facilities / supply free or discounted services to localities as a condition for obtaining a permit



# Keep Deployment Fees Reasonable

EXCESSIVE OR UNFAIR FEES WOULD RAISE COSTS FOR AMERICANS

- 1 Prohibit government fees that are not cost based
- 2 Prohibit discrimination against certain providers through higher ROW fees
- 3 Apply same interpretation for municipal-owned poles in ROWs
- 4 Confirm law requires cost-based fees for facilities outside ROWs



# Ensure Timely Access to Municipal-Owned Poles

Harmonize regulations nationwide by using agency's statutory authority to regulate municipal-owned poles

Align timeline for municipal pole access with 60-day timeline for other facilities



# Modernize Environmental & Historic Preservation Reviews

Exclude small cell support structures from environmental review

Modify rules for facilities in floodplains

Exclude certain wireless facilities from historic preservation review



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