

September 10, 2018

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Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: Accelerating Wireless Broadband Deployment by Removing Barriers to
Infrastructure Investment, WT Docket 17-79.

Dear Ms. Dortch:

On September 6, 2018, Paul Roberts, Vice President of Compliance, American Tower Corporation (“American Tower”), Liz Hill, Vice President for State and Local Affairs, American Tower, and the undersigned met with Suzanne Tetreault, Deputy Bureau Chief of the Wireless Telecommunications Bureau; Jonathon Campbell, Legal Advisor for the Wireless Telecommunications Bureau; Garnet Hanley, Chief of the Competition and Infrastructure Policy Division (“CIPD”); Jonathon Lechter, Deputy Chief of the CIPD; Jia Ming Shang, Acting Associate Chief of the CIPD; and Jennifer Salhus, of the CIPD.

During the meeting, American Tower expressed its support of the Draft Declaratory Ruling and Third Report and Order, FCC-CIRC 1809-02, released on September 5, 2018 (“Draft Order”). American Tower particularly welcomed the Draft Order’s provisions preserving local governments’ ability to address aesthetic concerns, its adoption of shorter shot clocks for small wireless facilities and its codification and clarification of Section 332 shot clocks applicable to small cells and macro sites. American Tower had advocated for such outcomes as they help balance the need to accelerate infrastructure deployment with local government concerns and will encourage use of collocation.¹

Consistent with its August 10th Ex Parte filing, American Tower reiterated the critical role that macro sites play in the deployment of wireless broadband services. In that filing American Tower discussed the fact that network deployments will consist of multiple layers – traditional macro towers will continue to provide a blanket of coverage as it does today, while underneath

¹ Letter From Richard Rossi, Senior Vice President, General Counsel, U.S. Tower Div. of American Tower, and Mneesha Nahata, Vice President, Corporate Legal Finance and Risk Management, American Tower, to Ms. Marlene Dortch, Secretary, FCC, WT Docket 17-79 (filed Aug. 10, 2018) (August 10th Ex Parte).

this umbrella, a combination of small cells and an array of other technologies will be deployed to increase network capacity, particularly in dense urban areas.²

The Draft Order's provisions regarding aesthetics are also consistent with American Tower's previously expressed view that local governments continue to have the ability to act as an "independent check" on the indiscriminate deployment of small cells.³ American Tower discussed the possibility that one way local governments could perform this function is by imposing cumulative or aggregate limits on the size of small cells or small cell structures as long as those limits are consistent with the Commission's previously adopted cumulative limits or pre-existing state or local limits. We also discussed the potential interplay between the streamlining provisions of the Draft Order and collocation pursuant to Section 6409 of the Spectrum Act and the Commission's implementing regulations.

Given the important role that macro towers play in the deployment of wireless broadband services, including 5G services, particularly in suburban and rural areas, American Tower discussed the need to next address issues that are causing unnecessary delays and increasing the costs of collocating on or constructing macro towers. One such issue involves revising rules to exclude from review compound expansions necessitated by additional providers collocating on existing facilities, just as such expansions are currently excluded from review when towers are replaced. American Tower also urged the Commission to quickly resolve the pending proceeding relating to twilight towers.⁴

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Michael H. Pryor

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² *Id.* at 2.

³ *Id.* at 8.

⁴ *See, e.g.* Comment Sought on Draft Program Comment for the Federal Communications Commission's Review of Collocations on Certain Towers Constructed Without Documentation of Section 106 Review, Public Notice, 32 FCC Rcd 10715 (2017).