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September 17, 2018

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Federal Communications Commission  
Attn: Ms. Marlene H. Dortch, Secretary  
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 Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WC Docket No. 17-84; Streamlining Deployment of Small Cell Infrastructure, WT Docket No. 16-421 – Request to Reconsider Orders*

Dear Ms. Dortch:

I write on behalf of the Marin County Board of Supervisors to oppose the Commission's intent to proceed with an ill-advised preemption of local authority. The Commission appears to be on the cusp of a rulemaking that would cripple local government authority to manage valuable public property, protect public safety, preserve the aesthetic appeal of our communities, and protect the interests of other property owners. All this damage would be done for the purpose of providing one industry and one technology with not just preferential treatment, but preferential treatment subsidized by local taxpayers and other users of the public rights of way.

We urge the Commission to reconsider these orders and to instead utilize a substantially lighter regulatory approach in this area. The Commission appears to reveal its lack of experience and expertise in managing and maintaining public rights of way, or understanding of local land use and zoning policies, and the distinct and often unique needs and priorities of individual communities. The Commission would best serve the worthy goal of encouraging broadband deployment by limiting or removing itself from a role in this area, and by focusing on updating its standards and best practices guidance.

The Commission's actions seem to reflect a belief that broad federal preemption of longstanding local authority and substantive changes to longstanding federal laws are needed to facilitate the greater deployment of wireless infrastructure. This assertion is not borne out by the record. We support the deployment of advanced, reliable and tested communications infrastructure in our community, including the appropriate deployment of small cell and other utilities that occupy the rights of way.

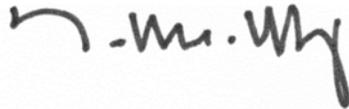
Based on our information, and contrary to many of the ex parte comments from the telecommunications industry representatives that were submitted between August 8, 2018 – August 10, 2018, the pace of installation may be affected by a number of

challenges, many of which originate with the telecommunications industry itself. These include incomplete applications or lack of submittal of such; and design, appropriate location and appearance issues.

We urge the Commission to reconsider these Orders, and to proceed cautiously in ways that recognize the value of a collaborative and cooperative approach to wireless facility siting. Wireless broadband deployment should proceed at a pace that protects public safety, the environment, our historic neighborhoods, public rights of way users, and the interests of neighborhoods and individual/adjacent property owners in affected areas.

The issues surrounding telecommunications infrastructure installations should be largely left under the direction of local and state government control and authority.

Respectfully Submitted,



Damon Connolly  
President, Marin County Board of Supervisors

C:        Senator Dianne Feinstein  
          Senator Kamala Harris  
          Representative Jared Huffman