

September 19, 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 18, 2018, Richard Rossi, General Counsel, U.S. Tower Division of American Tower Corporation (“American Tower”), Becca Gould, Senior Vice President, Public Affairs, American Tower Corporation, Paul Roberts, Vice President of Compliance, American Tower Corporation, Liz Hill, Vice President for State and Local Affairs, American Tower, and the undersigned, met with Erin McGrath, Wireless Legal Advisor to Commissioner Michael O’Reilly. Richard Rossi, Becca Gould, Liz Hill, and the undersigned separately met with Umair Javed, Wireless and International Legal Advisor to Commissioner Rosenworcel. Richard Rossi, Liz Hill, and the undersigned separately met with Rachel Bender, Wireless and International Advisor to Chairman Pai.

During the meetings, American Tower stated its overall support of the Draft Declaratory Ruling and Third Report and Order, FCC-CIRC 1809-02, released on September 5, 2018 (“Draft Order”). Consistent with its September 13, 2018 ex parte notice, we explained that the Commission should adopt language in the Draft Order to affirm the critical role of macro towers in the wireless ecosystem.¹ We also urged the Commission to next address issues that are impeding the ability of wireless providers to collocate on macro towers. Consistent with its August 10, 2018 ex parte letter, American Tower specifically identified the need to exclude from

¹ Letter from Becca Gould, Senior Vice President, Public Affairs, American Tower Corporation, Liz Hill, Vice President for State and Local Affairs, American Tower, and Michael H. Pryor, Counsel for American Tower Corporation, to Ms. Marlene Dortch, Secretary, FCC, WT Docket 17-79 (filed Sept. 13, 2018) (“September 13th Ex Parte”).

historic review limited compound expansions when providers seek to collocate on existing towers.² American Tower also urged the Commission to conclude the twilight tower proceeding.³

Finally, American Tower explained that some localities, in the context of local review and approval of facility collocations on existing wireless towers, are unnecessarily requiring towers previously constructed in compliance with regulations to undergo substantial modifications to meet more stringent structural standards. The practical result is to artificially constrain the capacity of towers to accommodate additional collocations. American Tower noted that this issue might be considered by the new BDAC disaster working group, and emphasized the importance of including a representative of the tower industry on the working group.

Please contact the undersigned if you have any questions.

Sincerely,

/s/ Michael H. Pryor
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²Letter 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”).

³ See 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).