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The City of Vadnais Heights
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September 20, 2018

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

Dear Ms. Dortch:

The City of Vadnais Heights is a suburban community of just over 13,000 people north of the twin cities about 15 minutes from either downtown. Our operation is lean and our dollars are spent frugally. We have a robust business community that is on the forefront of ingenuity and creativity in their respective fields. The business community and our residents are supportive of increased broadband deployment and supportive of technological advances to make our community better. That said, we have a responsibility to protect the investments our residents and business community have made to make our community a great place to live and work.

As mentioned before, the City operation is lean and budgets are conservative. We don't invest heavily in the extras and when we do, those are made cautiously and include ample public dialogue. Specifically, the City recently made an investment in our street lights through our downtown. They are decorative, have hanging baskets, and can include holiday decorations/banners. The previous lights were over 30 years old and literally falling over at times. That said, the new lights are something this community has become extremely proud of, particularly the business community which contributed to the development. Naturally, we are concerned that losing the opportunity to negotiate proper placement of small cell infrastructure could negatively impact the curb appeal our community worked so hard to achieve in our downtown corridor. Aesthetics are important to our community and make Vadnais Heights a special place.

Additionally there are other legitimate concerns: There is finite space within the ROW and proper review should be afforded to find the appropriate location for small cell facilities. As mentioned previously, the city's operation is lean and as is often the case, we are "one deep" in many positions. Proper time is needed to provide proper review as is the need to hire and pay for expertise to give proper review of these requests. Limiting time for review, or permit fees, puts the burden on the tax payers and not the businesses that will be profiting from these new technologies.

In conclusion, we ask the Commission to refrain from implementing preemptions. We are flexible and reasonable in allowing these types of services within our ROW. We ask that they not be unfair to the residents and businesses of Vadnais Heights.

Sincerely,

Kevin Watson, City Administrator