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September 25, 2017

VIA ECFS

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

Re: Notice of Ex Parte Communication – Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment, WT Docket No. 17-79

Dear Ms. Dortch:

On September 22, 2017, Kara Azocar, Regulatory Counsel, Federal Affairs, of General Communication, Inc. ("GCI"), along with Jessica Gyllstrom and Carolyn Mahoney of Telecommunications Law Professionals PLLC, met with Garnet Hanly, Suzanne Tetreault, Angela DeMahy, Paul D'Ari, and Mary Claire York of the Wireless Telecommunications Bureau ("WTB"). Erica Rosenberg, Aaron Goldschmidt and Jill Springer of WTB also participated via teleconference. The parties discussed the above-referenced docket, and GCI's presentation was consistent with its previous statements on the record.

During the meeting, GCI informed WTB staff of the various issues that it has encountered when applying for local or municipal wireless infrastructure permits, and encouraged the Commission to continue to move forward with removing barriers to infrastructure investment and deployment. Specifically, GCI reiterated its support for the implementation of a shorter shot clock (60 days for collocations, 90 days for other siting applications) and the adoption of a deemed granted remedy; and encouraged efforts towards resolving incomplete application issues, including the adoption of a definition of "complete" application or other guidance that may resolve delays that occur when a locality pauses the shot clock claiming an application to be "incomplete." GCI explained that it has encountered several instances where a locality requests additional information to make the application "complete" and, in most cases, much of the information requested is already contained in the original application, or is contained in the application in a slightly different form than is being requested upon review. GCI has also been informed that its application was incomplete because it did not include page numbers in its application.

GCI also explained that it continues to face delays regarding the resolution of siting applications before Native Tribes. Alaska has 229 federally recognized Tribes, and oftentimes GCI's



requests through TCNS are left unanswered due to missing or out-of-date and unverified contact information. GCI expressed support for the implementation of a “deemed granted” or “no objection” consideration if such notifications are not responded to by Tribes within 30 days, and also encouraged the FCC to require Tribes to maintain updated, verified, contact information in TCNS. GCI also suggested that the FCC implement a procedure that would appoint one Tribe or representative to be the proper contact if multiple Tribes are affected by one TCNS request, as is often the case in Alaska. Finally, GCI recommended that TCNS be modified to retain information for areas where concerns have been raised and reviews conducted so that future filers may be aware, which may reduce redundant requests and communications.

GCI also informed WTB staff of the imposition of telecommunications-tower set back requirements in multiple jurisdictions in Alaska. Specifically, GCI offered the following examples of such ordinances:

- One jurisdiction requires that telecommunications towers be 200% of the allowable or actual tower height (whichever is greater) from any principal structure on residentially zoned land or school or childcare center.
- Another jurisdiction requires that telecommunications towers must be set back from adjacent property lines a distance equal to or greater than the actual height of the tower.

GCI explained that such requirements only apply to telecommunications towers, therefore discriminating against wireless providers and hindering infrastructure development and deployment. GCI encouraged WTB staff to impose regulations to discourage this type of behavior.

As indicated through these discussions, GCI supports the FCC in its efforts to close the digital divide, and believes that its recommendations for enabling effective and efficient buildout by reducing barriers to infrastructure deployment will enable providers like GCI to continue to strive for optimized service in Alaska and other rural and underserved areas.



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Sincerely,

/s/ Jessica DeSimone Gyllstrom

Jessica DeSimone Gyllstrom
of TELECOMMUNICATIONS LAW PROFESSIONALS PLLC

cc (via email): Garnet Hanly
 Suzanne Tetreault
 Angela DeMahy
 Paul D'Ari
 Mary Claire York
 Erica Rosenberg
 Aaron Goldschmidt
 Jill Springer