

November 29, 2017

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

RE: Draft Program Comment Addressing Collocation on Twilight Towers
WT Docket No. 17-79

Dear Ms. Dortch,

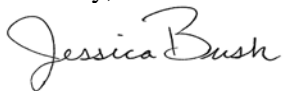
After having reviewed the draft program comment addressing Collocation on Twilight Towers (WT Docket No. 17-79), the Montana SHPO (MT SHPO) has some concerns about the proposed rule changes. First, we strongly disagree that there is a 'limited likelihood that Section 106 review could identify adverse effects from these towers that are not yet known after 12 years or more' (page 2). The location of twilight towers in Montana have never been made known to the MT SHPO, so there is no way we, or anyone else, can know if there have been adverse effects, no matter how many years have passed.

If the FCC wants to base this program comment on the fact that twilight towers have a limited likelihood to have an adverse effect on Historic Properties, then they should provide evidence to this case, not just an unsubstantiated statement. To date, the cellular companies have identified 4,298 twilight towers. If provided access to that information, the MT SHPO would be willing to review the towers that are in Montana to see if there are any that potentially have had an adverse effect.

Finally, the MT SHPO is not responsible for keeping track of which cellular towers have gone through the Section 106 process. This issue was not 'exacerbated by the limitations of State Historic Preservation Officers record-keeping' (page 2), but instead is the result of poor record keeping by the FCC and cellular companies. If a tower did not go through the Section 106 process, then our office would never have been notified about it, and therefore we would have no record.

We strongly disagree with excluding twilight towers from Section 106 review and are more than willing to work with the FCC and cellular companies to reach solution that satisfies both sides. As it stands, the draft program comment gives cellular companies everything they want, but addresses none of our concerns with regards to historic preservation.

Sincerely,



Jessica Bush, M.A.
Review and Compliance Officer, Deputy SHPO
Montana State Historic Preservation Office

Cc: Erik Hein, National Conference of State Historic Preservation Officers *via email*