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The Honorable Tom Wheeler, Chairman
Federal Communications Commission 445
12th St., Southwest
Washington, D.C. 20554

Dear Chairman Wheeler,

I'm writing to follow up on our meeting of April 25, 2016. I was encouraged that we agreed that our goal must be to both support the continued growth of our Nation's wireless infrastructure and protect American workers whose jobs require them to come in close proximity to RF transmitters. Because of changes in the wireless infrastructure environment more and more roofers, painters, firefighters, and telecommunications technicians find themselves working within the restricted zone of RF transmitters every day, often without any knowledge that they are doing so. But, unfortunately, neither the FCC nor our industry has addressed the implications of this change.

The law is clear. FCC rules prohibit all but specially trained workers from working close to RF transmitters while they are operating. But the extraordinary growth in the number, type, and placement of transmitters has rendered the 20th Century approach to complying with this rule—the use of nothing more than faded signs with outdated contact information on rooftop doors and fences around increasingly rare stand-alone towers—to be unreliable and therefore non-compliant. Transmitters are now everywhere. They are in church steeples, lamp posts, building facades, and anywhere else an enterprising wireless company can place them. Often companies design them to be invisible to comply with regulations or for esthetic reasons. As a result, signs and fences simply no longer reliably protect the tens of thousands of third-party workers repairing shingles, changing light bulbs, or applying paint in situations when they don't even know they are being overexposed.

When we met, I requested that the FCC recognize and address this problem in a way that protects American workers, supports continued industry investment, and takes advantage of 21st Century tools. As we discussed, I do not support new regulations and I requested that the FCC should convene a meeting between the key wireless carriers and the National Antenna & Tower Safety Center (NA&TSC) to discuss the implementation of their technology that ensures: (1) communications between all stakeholders (multiple co-located licensees, government RF users, building owners, workers, and others); (2) provision of site-specific RF safety information prior to coming in close proximity with RF transmitters; and (3) administered by a neutral and independent third party. Unfortunately, the meeting between key wireless carriers and the NA&TSC was never convened while every day more and more American workers face risk of injury from RF exposure.

Since our meeting the NA&TSC has been working diligently with some of the world's largest insurers to develop a product which will provide no-cost coverage against RF injury claims at all wireless sites for carriers, tower operators, site owners, and contractors who follow the NA&TSC safety protocol. The ability to be vetted by prominent insurers speaks volumes of the effectiveness of NA&TSC model. With this extraordinary event now a reality, I again request the FCC convene a meeting between key wireless carriers and NA&TSC.

Sincerely,



Gil Amelio