



September 26, 2014

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

Re: *Ex Parte* Submission “Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies” WT Docket Nos. 13-32 & 13-238 & WC Docket No. 11-59 (NPRM)

Dear Ms. Dortch:

On Friday, September 26, 2014 Mark Uncapher of the Telecommunications Industry Association (“TIA”)<sup>1</sup> spoke by telephone with Chad Breckinridge, Associate Chief of the Wireless Telecommunications Bureau. We discussed the need for the Commission to move quickly to finalize rules in its pending wireless infrastructure proceeding in order to expedite the wireless siting process.

TIA shares the objective supported with others in this proceeding that modernizing wireless siting is essential to help to satisfy the exploding demand for wireless broadband services. To that end, as the Commission considers final rules, TIA renewed a number of the points previously taken in this proceeding:<sup>2</sup>

- TIA supports the proposal by PCIA and the HetNet Forum which is contained in the NPRM to use a definition of facilities that relies on defining the maximum cubic volume of the relevant facilities rather than on specific technological labels.
- TIA supports the proposal to encourage small cell deployment by clarifying that the collocation exclusion, applying it not only to collocations on existing antenna towers and buildings, but also to facilities mounted on structures such as utility poles, water tanks, light poles, and road signs, thus excluding them from environmental review except for historic preservation and RF emissions exposure compliance.

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<sup>1</sup> TIA is a Washington, DC-based trade association and American National Standards Institute (ANSI)-accredited standard developer that represent the global information and communications technology (“ICT”) manufacturer, vendor, and supplier community. TIA represents approximately 500 participating companies producing products and services empowering communications in every industry and market, including healthcare, education, security, public safety, transportation, government, the military, the environment, and entertainment. See <http://tiaonline.org/>.

<sup>2</sup> See, TIA NPRM Comment, February 3, 2014; <http://apps.fcc.gov/ecfs/document/view?id=7521070866>

- TIA supports the NPRM’s proposed approach for temporary towers. Among the advantages of distributed antenna systems and small cell systems is their deployment flexibility, including meeting short term increases in demand with temporary installations. Antenna siting procedures did not anticipate the potential of such short-term applications.
- TIA supports allowing localities to condition “the approval of a modification on the underlying structure’s compliance with the hardening standards under TIA-222 Revision G, Structural Standards for Antenna Supporting Structures and Antennas

Pursuant to Section 1.1206 of the Commission’s rules,<sup>3</sup> this letter is being electronically filed via ECFS and a copy of this submission is being provided electronically to the meeting attendees.

Respectfully submitted,

**TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

By: /s/ Mark Uncapher

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cc: Chad Breckinridge,  
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<sup>3</sup> See 47 C.F.R. § 1.1206.