



VIA ELECTRONIC COMMENT FILING SYSTEM (ECFS)

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

Notice of Ex Parte Communication

Re: Acceleration of Broadband Deployment by Improving Wireless Facilities Siting Policies (WT Docket No. 13-238); Acceleration of Broadband Deployment: Expanding the Reach and Reducing the Cost of Broadband Deployment by Improving Policies Regarding Public Rights of Way and Wireless Facilities Siting (WC Docket No. 11-59)

Dear Ms. Dortch:

On October 9, the undersigned spoke with Renee Gregory, Legal Advisor to Chairman Tom Wheeler, via telephone to discuss the above-referenced proceedings.

We discussed the pending Order on wireless infrastructure and urged the Commission to implement a transition period that is practical given the enormity of the undertaking required by the new Order. For most local governments, city councils and county commissions or boards typically do not meet on a weekly basis like larger jurisdictions commonly do and county zoning boards, whom we consider subject matter experts in siting and collocation issues, often meet less frequently. Such changes must be made following existing state and local laws and requirements, including noticing official meetings and agenda, informing the public, providing opportunity for comment, public input and testimony and securing the necessary legal reviews and documentation by either the jurisdiction's legal department or outside counsel. Additionally, in the November/December months, local government units may even meet less frequently as to accommodate end of year activities, reflecting seasonal and other considerations.

Further, in some instances, action by state legislatures may be necessary to support local compliance with the order; these bodies typically meet more infrequently and rarely at the end of the year. Such bodies, when they do meet, conduct limited sessions, pursuant to law and constitutions. In order to facilitate an effective and harmonious transition that incorporates both local and state needs and views, we recommended that the Order not go into effect any earlier than January 1, 2015 and ideally would go into effect no earlier than 90 days from publication in the Federal Register.



It was also noted that between now and November most if not all county governments will be consumed with the work of preparing for and conducting elections in addition to addressing any potential aftermath. Amending local ordinances and changing permitting systems and policies to conform local rules and practices to the pending Order, while an important undertaking, is not likely to take priority over preparation for and the conduction of mid-term elections.

This letter is being filed electronically pursuant to Section 1.1206 of the Commission's Rules. Please contact the undersigned if you have any questions.

Sincerely,

/s/Yejin Jang

Associate Legislative Director
National Association of Counties

Cc: Renee Gregory