



October 10, 2014

Via Electronic Filing

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

Re: *Written ex parte, WT Docket Nos. 13-238, 13-32; WC Docket No. 11-59*

Dear Ms. Dortch:

Mobile Future supports the Commission's commitment to bolstering wireless infrastructure deployment by easing regulatory burdens associated with such efforts. The changes proposed by the Commission would help foster investment and innovation in our wireless networks and support the rising consumer demand that has been a hallmark of the mobile industry.

The Commission's Broadband Acceleration Docket¹ takes steps forward in encouraging and streamlining wireless infrastructure deployment. As acknowledged in the NPRM, the number of cell sites in use has increased by 61% in the last decade.² Network providers have invested at record levels in next generation infrastructure in order to remain competitive and to meet consumer demands. To further advance these goals, the Commission should act quickly and decisively to help speed broadband deployment.

¹ *In re* Acceleration of Broadband Deployment by Improving Wireless Facility Siting Policies; 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; Amendment of Parts 1 and 17 of the Commission's Rules Regarding Public Notice Procedures for Processing Antenna Structure Registration Applications for Certain Temporary Towers; 2012 Biennial Review of Telecommunications Regulations, *Notice of Proposed Rulemaking*, WT Docket Nos. 13-238, 13-32; WC Docket No. 11-59; RM-11688, FCC 13-122 (rel. Sept. 26, 2013) ("NPRM").

² *Id.* at 2.

The Commission should provide clear definitions and application guidelines through implementation of Section 6409(a) of the Spectrum Act³ to ensure predictability for parties submitting Eligible Facilities Requests (“EFRs”). Adopting definitions that are necessary for the application of Section 6409(a) will facilitate technology upgrades and increase the efficiency and reliability of services without unnecessary regulatory delay.

While the substance of these rules is critical, so is timing. The FCC should require action on Eligible Facilities Requests within forty-five days. The “shall approve” mandate of Section 6409(a) warrants this type of prompt review and such a decision will foster continued investment in wireless infrastructure.

Consumer access to high-speed wireless broadband depends on resilient infrastructure that supports those services. American wireless consumers demand high quality and high-speed wireless Internet access, and network providers are intent in meeting that demand. Streamlining rules to ensure our network infrastructure can best serve American consumers and help sustain our nation’s economy and global competitiveness must remain a Commission priority. The Broadband Acceleration Docket is a meaningful step towards achieving these goals.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of the letter is being filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Respectfully submitted,

/s/ Jonathan Spalter

Jonathan Spalter, Chair
Allison Remsen, Executive Director
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cc: Roger Sherman
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³ Middle Class Tax Relief and Job Creation Act of 2012, 112 Pub. L. 96, Title VI, 126 Stat. 156, 232, §6409(a) (2012) (“Spectrum Act”), *codified at* 47 U.S.C. § 1455(a).