



HARRIS, WILTSHIRE
& GRANNIS LLP

October 10, 2014

Ex Parte

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

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, 2014, Jennifer McKee of the National Cable & Telecommunications Association (NCTA), Paul Margie of Harris, Wiltshire & Grannis LLP, and Walter Anderson of Harris, Wiltshire & Grannis LLP met by telephone with Renee Gregory, Legal Advisor to Chairman Wheeler. The same day, Rick Chessen of NCTA and Mr. Anderson met by telephone with David Goldman, Legal Advisor to Commissioner Rosenworcel. On October 10, 2014, Mr. Chessen and Mr. Anderson met by telephone with Louis Peraertz, Legal Advisor to Commissioner Clyburn. In each meeting, we discussed the above-referenced proceedings, and we commended the Commission's efforts to facilitate wireless infrastructure deployment, which will promote increased wireless broadband access for consumers nationwide. We also discussed the increasingly important role Wi-Fi based services are playing in the broadband ecosystem, and we emphasized that the Commission's policies should not inadvertently undermine the deployment of facilities that support Wi-Fi based services.

In addition, on October 9, 2014, Mr. Anderson emailed Chad Breckinridge, Associate Bureau Chief in the Wireless Telecommunications Bureau, and recommended that the Commission (1) define an "existing base station" as "any structure that supports or houses an antenna, transceiver, or other associated equipment that constitutes part of a base station, even if the structure was not built for the sole or primary purpose of providing such support, provided that the structure supports transmission equipment other than devices approved under 47 C.F.R. § 15.247 or 47 C.F.R. Part 15, Subpart E" and (2) clarify that Part 15 devices deployed without individual local government siting approvals for specific structures would not be sufficient to cause a supporting structure to be defined as an "existing base station."

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Sincerely,

/s/ Walter E. Anderson

Walter E. Anderson
Counsel to NCTA

cc: Renee Gregory
David Goldman
Louis Peraertz
Chad Breckinridge