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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

Dear Ms. Dortch:

On September 17, 2014, Verizon filed a letter in the above-referenced proceeding asking that the definition of the term “substantially change the physical dimensions of such tower or base station,” as that term appears in Section 6409(a) of the Spectrum Act,¹ for non-tower structures allow new facilities to extend up to six feet wider than the widest point on the structure (which may be an appurtenance attached to the structure) and to allow new facilities to extend up to 15 feet above the highest point on the roof (which may be an appurtenance attached to the structure).² Subsequently, Verizon requested that if the height limitation in the definition is stated as a percentage of the height of the structure, the Commission should adopt a minimum allowable height increase of ten feet to account for circumstances where the structure is short, making the percentage too small to accommodate wireless facilities.³

A six-foot width allowance is needed because the typical facilities that Verizon mounts on building facades and on structures such as utility poles and water tanks require five to six feet to account both for the width of the antenna panels and the mounting arms that attach the antenna panels to the structure. Verizon asked for a minimum allowance of ten feet in height to accommodate the height of panel antennas and their mounting brackets, to enable the antennas to clear other structures on roof-tops, such as parapet walls and HVAC facilities – which can limit the coverage provided by the facilities, and to reduce the radiofrequency emissions produced by antennas on the surface of the roof.

This letter is being filed pursuant to Section 1.1206 of the Commission’s Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "Tamara Preiss".

¹ Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, §6409(a), 126 Stat. 156 (2012) (codified at 47 U.S.C. § 1455(a)).

² Letter from Tamara Preiss, Verizon, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 13-238 (filed September 17, 2014).

³ See Letter from Tamara Preiss, Verizon, to Marlene H. Dortch, Secretary, FCC, WT Docket No. 13-238 (filed October 8, 2014).