



**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 15, the undersigned spoke with Chad Breckinridge, Wireless Telecommunications Bureau, via telephone to discuss the above-referenced proceedings.

We discussed the pending Order on wireless infrastructure and urged the Commission to implement a 90 day shot clock in lieu of other suggestions such as 45 or 60 days. Counties are currently compliant with the 90 and 150 day shot clock as imposed in the *Arlington* decision. Departure from existing time limits would impose an unnecessary hardship especially on rural counties, of which there are roughly 2000 (total number of counties: 3,069). We urge the Commission to implement a shot clock that is 90 days and no shorter than 60 days.

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: Chad Breckinridge

