

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

In the Matter of )  
 )  
Enhancements to Uniform Licensing System ) WT Docket No. 14-161  
and Antenna Structure Registration System for )  
Providing Access to Official Authorizations )

**COMMENTS OF AT&T**

AT&T Services, Inc., on behalf of its affiliated companies, (collectively “AT&T”) files these comments on the Public Notice (“*Public Notice*”) announcing enhancements to the Federal Communication Commission’s (the “Commission”) Universal Licensing System (“ULS”) and Antenna Structure Registration (“ASR”) System to allow electronic access to official active authorizations.<sup>1</sup>

**DISCUSSION**

AT&T welcomes and supports the Commission’s proposal to enhance ULS and its ASR system to reduce the use of paper copies of official Commission authorizations and to make electronic records the default format for authorizations. These changes will lead to a more efficient system to transmit authorizations, save Commission resources, and reduce workloads for Commission licensees and registrants.

Currently, Commission licensees receive paper authorizations when a license is granted, renewed, and undergoes a major modification.<sup>2</sup> Antenna structure registrants receive paper authorizations following initial registration of an antenna structure, modification of a registered

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<sup>1</sup> *Public Notice*, Enhancements to Uniform Licensing System and Antenna Structure Registration System for Providing Access to Official Authorizations, WT Docket No. 14-161 (2014) (*Public Notice*).

<sup>2</sup> 47 C.F.R. §1.947.

antenna structure, cancellation of an ASR, administrative updates of ASRs, withdrawals of pending ASR applications, amendments of pending ASR applications, completion of antenna structure construction, requests for a duplicate ASR, and ownership changes on registered antenna structures. After grant of each of these license and ASR applications, the Commission sends licensees and registrants a paper authorization by United States mail.

Because the Commission sends authorizations in hard-copy paper form, licensees and antenna structure registrants must establish and maintain processes for preserving those authorizations, by either retaining the paper authorization in a file cabinet or converting the paper authorization to electronic form, such as a pdf. Regardless of the method used, licensees and antenna structure registrants spend substantial time, monetary, and resources tracking, scanning (or filing), and retaining the authorizations for every license or registered antenna structure. For licensees and registrants with a substantial number of licenses and antenna structures, this is a significant effort. These efforts can be streamlined by transitioning from paper records to electronic records.

As the Commission has concluded, it can readily notify and provide authorizations to licensees and registrants by e-mail. E-mail is now the prevalent means of business communications between individuals throughout the world and exponentially outnumbers communications received by United States mail. Thus, authorizations sent to an e-mail address that a licensee or registrant provides for their receipt are likely to arrive at their ultimate destination and be processed more quickly than if sent by United States mail. Further, “making the authorizations immediately available to licensees and registrants electronically eliminates the risk of an authorization getting lost or damaged in delivery.”<sup>3</sup> Licensees and registrants seeking

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<sup>3</sup> *Public Notice* at 3.

access to official authorizations after the initial grant may download, save, and print those authorizations by logging into License Manager in ULS or ASR Dashboard in the ASR System. AT&T's has found License Manager and ASR Dashboard to be sufficient to meet its needs when official authorizations are needed.

Providing licensees and antenna structure registrants with authorizations electronically is more efficient than mailing paper authorizations, facilitates easy and efficient record retention, and reduces the paperwork collection burden on licensees and registrants. Licensees and registrants can electronically save authorizations with a few keystrokes and minimize the physical space needed to retain documents. It also minimizes the cost to the Federal Government of disseminating authorizations and makes effective use of information technology. According to Commission data, in 2013 alone the Commission printed and mailed 451,072 registrations and wireless licenses, at a cost of nearly \$304,000.<sup>4</sup> Eliminating (or even substantially reducing) mailed authorizations would allow the Commission to more efficiently use its resources, redirecting them to upgrade the Electronic Comment Filing System ("ECFS"), ULS, the ASR system, or other Commission managed systems.

AT&T supports the proposals in the *Public Notice* to establish an interim test period before implementation of final procedures, during which time licensees and registrants can elect to stop receiving authorizations on paper through the United States mail. The Public Notice does not explain how licensees and registrants with pending license or ASR applications will receive authorizations during this interim test period. As proposed for the final procedures, licensees and registrants that elect to cease receiving authorizations on paper during the interim test period

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<sup>4</sup> *Id.*

should receive an e-mail message with the attached authorization, or at a minimum, a link to the authorization in ULS or the ASR system.

For the foregoing reasons, AT&T supports a transition to electronic authorizations proposed in the *Public Notice*.

Dated: November 10, 2014

Respectfully submitted,



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