Colleen Thompson
Associate Director
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, N.W.
Suite 1000
Washington, D.C. 20036
Phone: 202-457-3020
Email: cm7512@att.com

January 13, 2016

Via Electronic Filing

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Room TW-A325
Washington, D.C. 20554

Re: Program Alternative for Small Wireless Communications Facility Deployments, WT Docket No. 15-180
Ex Parte Communication

Dear Ms. Dortch:

On January 11, 2016, AT&T representatives Robert Vitanza, Colleen Thompson, Chet Taylor, Sandeep Gupta, Celia Nogales (by telephone), Rob Mrla (by telephone), and Paula Doublin (by telephone) met with Chad Breckinridge, Jeff Steinberg, Steve DelSordo, Paul D'Ari, Jill Springer, Don Johnson, Gregory Vadas, Mary Anne York (by telephone), Mania Baghdadi (by telephone), Bill Stafford (by telephone), and Saurbh Chhabra (by telephone) of the Wireless Telecommunications Bureau ("WTB") to discuss the Section 106 Scoping Document for small wireless communications facility deployments. A copy of the presentation given to the WTB representatives is attached to this letter.

AT&T discussed the importance of streamlining the Section 106 review process for small wireless facility deployments, which allow carriers to serve areas that are hard to reach with traditional macro sites and thus, provide significant benefit to consumers. The Collocation Nationwide Programmatic Agreement and Section 106 exclusions adopted in WT Docket No. 13-238 streamline Section 106 review for many small wireless facility deployments on existing structures. Yet, many other such deployments are still subject to Section 106 review merely because the support structure is over 45 years of age, even when that structure is neither historic in character nor located near structures of historic character and even if the small wireless facility is minimally intrusive. In AT&T's view, there is substantial room to expand the Section 106 exclusions to cover these types of small wireless facility deployments.

Colleen Thompson
Associate Director
Federal Regulatory

AT&T Services, Inc.
1120 20th Street, N.W.
Suite 1000
Washington, D.C. 20036
Phone: 202-457-3020
Email: cm7512@att.com

AT&T showed the WTB examples of stealth deployments that blend with their environment and should not be counted as part of any size limit that a Program Alternative may require to qualify for Section 106 exclusion. AT&T explained how these stealth deployments were a result of working closely with local communities to suit their needs and how excluding small wireless facility deployments approved by local communities from Section 106 SHPO review would eliminate superfluous requirements and reduce unnecessary administrative steps for the placement of such facilities. AT&T also discussed the importance of properly grounding all small wireless facilities for the safety of nearby structures, employees, and the general public.

AT&T applauds the WTB's continued efforts to streamline the process for small wireless facility deployments so that consumers can benefit from the network coverage these deployments will provide now and in the future. Pursuant to Section 1.1206 of the Commission's rules, an electronic copy of this letter is being filed for inclusion in the above-referenced docket. Please contact me if you have any questions.

Sincerely,

Colleen Thompson

cc: Chad Breckinridge
Paul D'Ari
Jeff Steinberg
Steve DelSordo
Don Johnson
Jill Springer
Gregory Vadas
Mary Anne York
Mania Baghdadi
Bill Stafford
Saurbh Chhabra

oDAS and Small Cell

Outdoor Distributed Antenna Systems (oDAS) and Small Cell

© 2010 AT&T Intellectual Property. All rights reserved. AT&T and the AT&T logo are trademarks of AT&T Intellectual Property.

oDAS and Small Cell Deployments

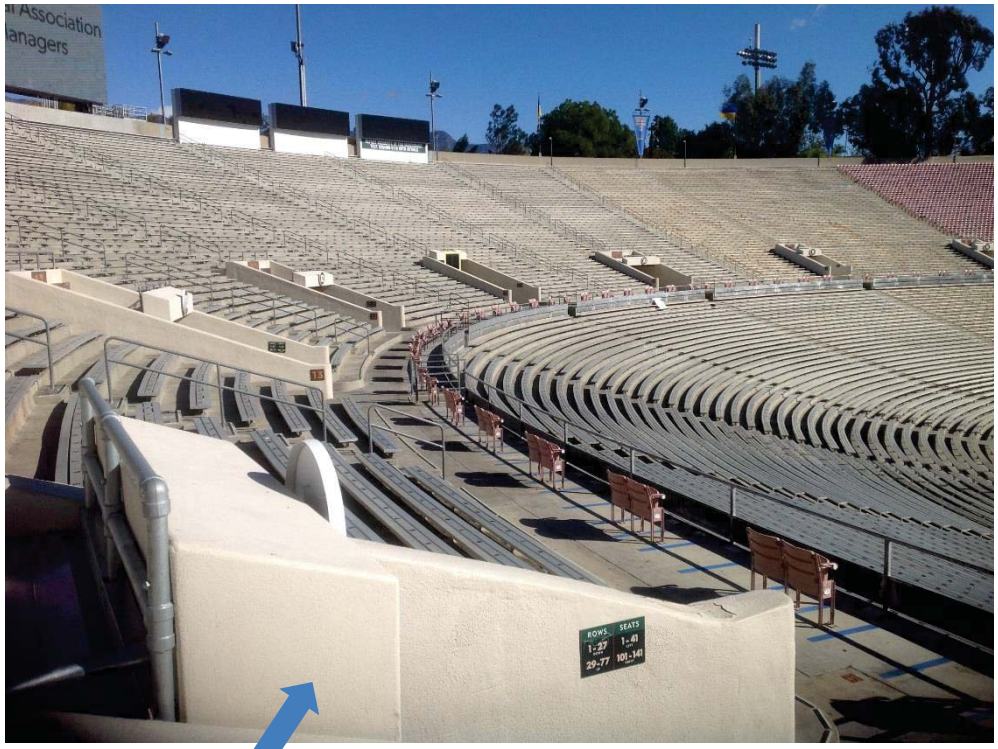
- Existing buildings & poles (traffic, light, & utility) are first priority
- Utilize smallest suitable and reliable components
- Painting components to match building or pole to blend when appropriate
- Deployments differ, depending on the needs/requirements of the local area

Real Life Examples of Stealth Deployments
Children's Adventure Garden, Dallas Arboretum

Real Life Examples of Stealth Deployments – Children's Adventure Garden, Dallas Arboretum

Real Life Examples of Stealth Deployments – Rose Bowl Deployment

Antenna



Antennas inside faux wall @ each tunnel

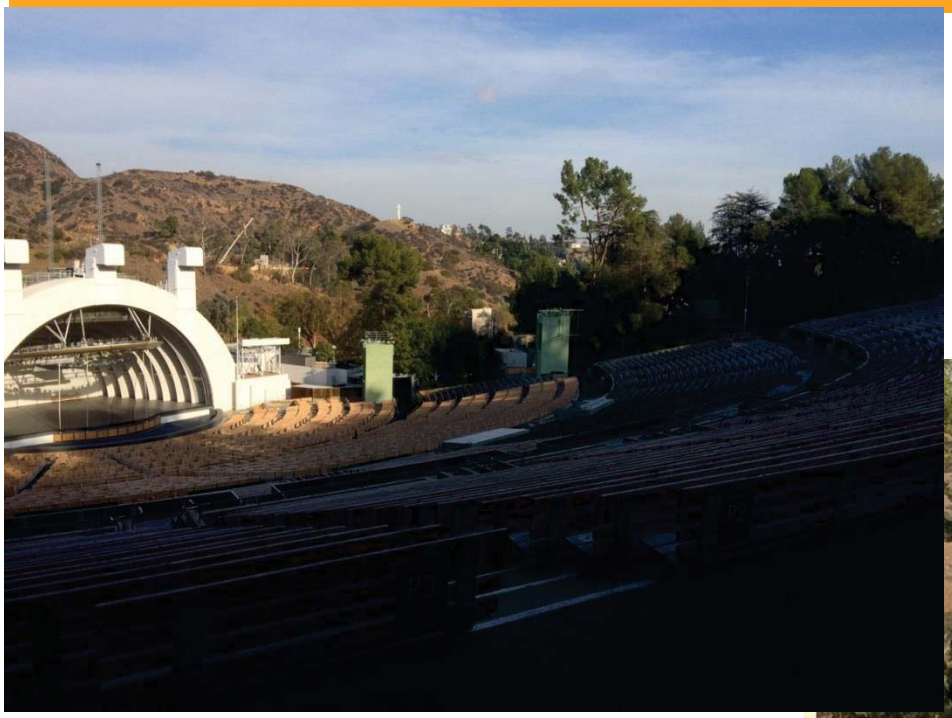
Tunnel Elevation

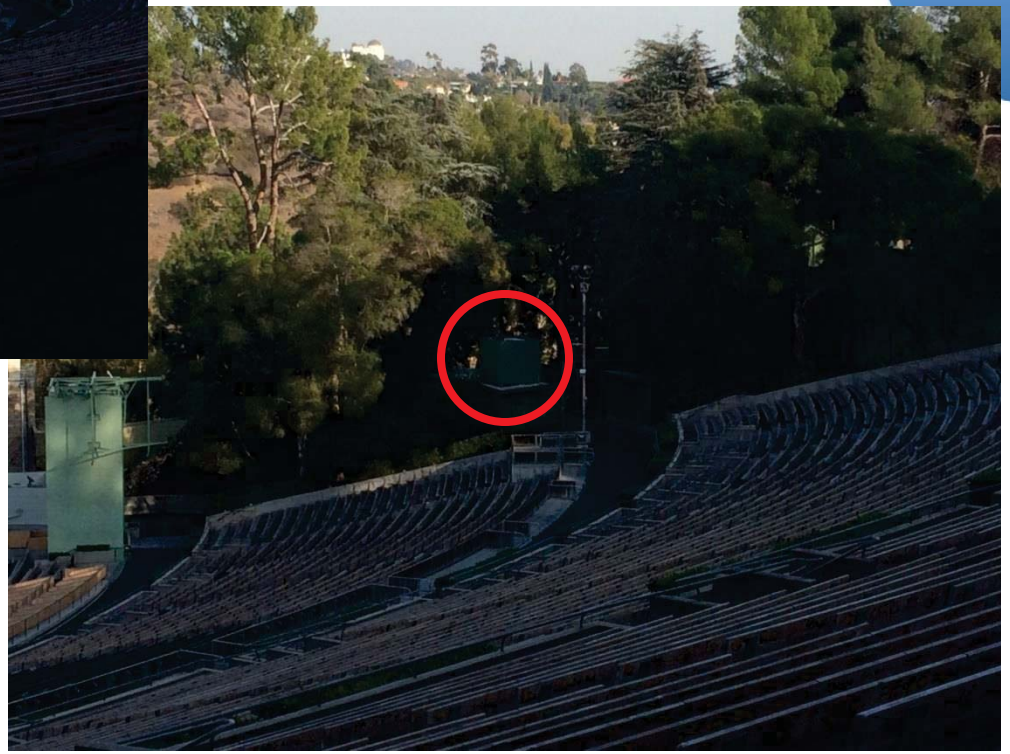
Hollywood Bowl, Los Angeles

- Due to the historical nature of the venue, aesthetics were a major concern:
  - Antennas: had to either stealthed or placed out of view
  - Head end equipment shelter:
    - No available space within existing structures and limited options to construct a shelter
    - Custom shelter designed to fit within parking lot island
    - Texture finished & painted to blend with other structures at the venue

AT&T Proprietary (Internal Use Only) Not for use or disclosure outside the AT&T companies except under written agreement

Hollywood Bowl, Los Angeles





AT&T Proprietary (Internal Use Only) Not for use or disclosure outside the AT&T companies except under written agreement

Grounding

- **Properly installed grounding safeguards equipment, nearby buildings, employees, and the general public from unintentional fault currents and lightning. Ineffective grounding compromises safety and service quality.**

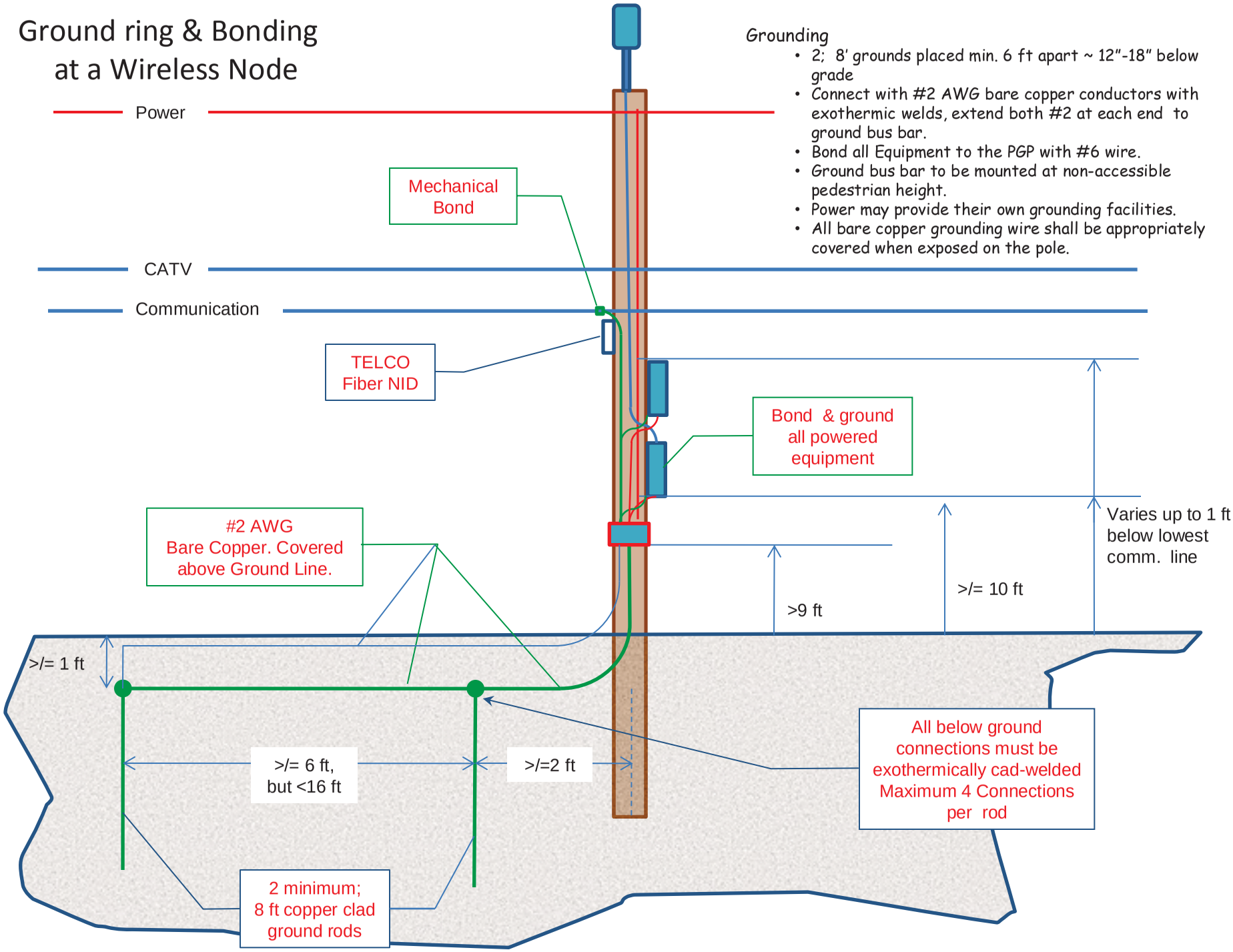
- **2-4 ground rods are needed, depending on geology and seasonal variations in soil. Higher moisture content = lower soil resistance and fewer ground rods.**

  – Black dirt (i.e. soils with high organic content) conducts better because of higher moisture content

  – Sandy soil drains faster and has lower moisture content and electrolytes, with greater resistance.

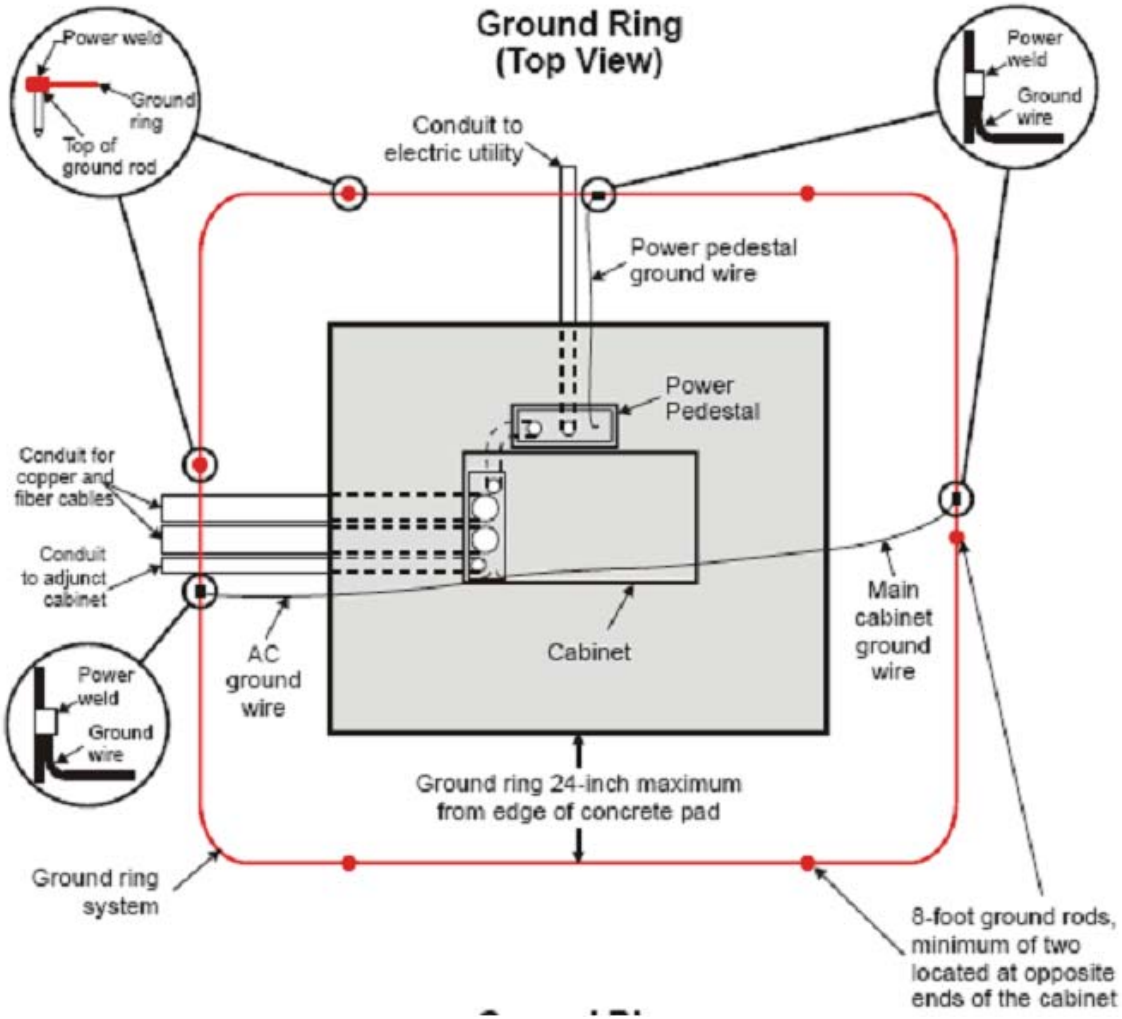
  – Solid rock, rocky and volcanic ash have little to no moisture or electrolytes in the soil, with high levels of resistance. Effective grounding is difficult to create and maintain, requiring more ground rods.

Ground ring & Bonding at a Wireless Node



Grounding

- 2; 8' grounds placed min. 6 ft apart ~ 12"-18" below grade
- Connect with #2 AWG bare copper conductors with exothermic welds, extend both #2 at each end to ground bus bar.
- Bond all Equipment to the PGP with #6 wire.
- Ground bus bar to be mounted at non-accessible pedestrian height.
- Power may provide their own grounding facilities.
- All bare copper grounding wire shall be appropriately covered when exposed on the pole.


Ground Ring
(Top View)
Power weld
Ground ring
Top of ground rod
Power weld
Ground wire
Conduit to electric utility
Power pedestal ground wire
Power Pedestal
Conduit for copper and fiber cables
Conduit to adjunct cabinet
Power weld
Ground wire
AC ground wire
Cabinet
Main cabinet ground wire
Ground ring 24-inch maximum from edge of concrete pad
Ground ring system
8-foot ground rods, minimum of two located at opposite ends of the cabinet

Questions