



Wireless
Infrastructure
Association

May 31, 2016

VIA ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, DC 20554

Re: Public Safety and Homeland Security Bureau Seeks Comment on Wireless Carriers' Proposal to Increase Resiliency and Enhance Information Sharing During Disasters, PS Docket Nos. 13-239, 11-60

Dear Ms. Dortch:

The Wireless Infrastructure Association (“WIA”)¹ writes in support of the Wireless Network Resiliency Cooperative Framework (“Framework”) developed by wireless carriers AT&T, Sprint, T-Mobile, U.S. Cellular, and Verizon as well as CTIA, as detailed in the Federal Communications Commission’s (“FCC” or “Commission”) Public Safety and Homeland Security Bureau’s (“PSHSB” or “Bureau”) Public Notice.² WIA believes the Framework’s consensus-based approach will help ensure continuity of service for our nation’s wireless networks during times of emergency. The cooperative steps outlined in the Framework’s five prongs will increase information sharing among industry and enhance consumer understanding. WIA also encourages actions to educate local governments on the effects of facility siting rules and approval processes on network resiliency; in particular, damaging interpretations of objective building code standards that could impede network resiliency. Most importantly, the Framework accomplishes the goals of the PSHSB in the above-captioned dockets—maintaining

¹ The Wireless Infrastructure Association (“WIA”) is the principal organization representing the companies that build, design, own and manage telecommunications facilities throughout the world. Its over 230 members include carriers, infrastructure providers, and professional services firms.

² Public Safety and Homeland Security Bureau Seeks Comment on Wireless Carriers' Proposal to Increase Resiliency and Enhance Information Sharing During Disasters, *Public Notice*, PS Docket Nos. 13-239, 11-60, DA 16-463 (rel. Apr. 28, 2016).

resilient networks and providing transparency for consumers—without the need for additional inflexible regulation or legislative action.

WIA shares the Commission's and the Bureau's goals of ensuring all Americans have access to resilient, reliable networks in times of need.³ WIA understands the diverse concerns each individual communications provider must evaluate to deploy and maintain a reliable network. The heterogeneous nature of today's wireless networks and the push towards denser networks ensures a high degree of redundancy that contributes to survivability of service. Relatedly, the wireless infrastructure industry has also continued to offer new services and products to provide additional network reliability through the utilization of neutral-host, shared backup power solutions.

WIA agrees that public education is key to understand and prepare for potential emergencies. As such, the consumer outreach strategies and efforts to improve public awareness of service restoration detailed in the Framework will contribute significantly toward ensuring citizens are ready in the event of an emergency.

WIA supports the Framework's aims of developing best practices alongside local government stakeholders to facilitate coordination before, during, and after emergencies. During an emergency, a multitude of factors can affect attempts to restore wireless service, including: (1) physical access to cell sites through building rooftops and public and private roads, and (2) restoration of electric power and backhaul (either wired or wireless). In many cases, these factors are outside of a provider's direct control. Industry efforts to provide redundant backhaul and backup power solutions can be met with specific state and local legal and regulatory barriers, including aesthetic, environmental, and noise-related concerns.

Moreover, working with local governments on improving facility siting rules and approval practices is particularly important in light of recent local interpretations of the International Building Code ("IBC") in a way that could stymie network deployment. While communications towers have historically been categorized as Category II

³ See Comments of PCIA – The Wireless Infrastructure Association, PS Docket Nos. 13-239, 11-60, at 3-5 (Jan. 17, 2014) (underscoring providers' commitment to maintaining reliable service); Reply Comments of PCIA – The Wireless Infrastructure Association, PS Docket Nos. 13-239, 11-60, at 3-7 (Feb. 18, 2014) (same).

structures in accordance with the IBC, increasingly, jurisdictions are misinterpreting the IBC to require that towers meet Category IV standards, which will have the troublesome result of reducing the availability of wireless service in emergency situations. Category IV standards significantly increase deployment costs, which may prohibit the provider from improving its network by building new structures or upgrading existing facilities. As a result, providers' ability to maintain sufficient network coverage in emergency situations suffers due to fewer redundant facilities available to substitute for those impacted by the loss of power. Therefore, increased understanding and cooperation by localities is integral to deploying resilient and reliable wireless networks.

WIA supports the efforts of its members and industry participants in developing the Framework and looks forward to the potential for enhanced industry and local government coordination and improved public education.

Sincerely,

A handwritten signature in black ink, appearing to read "Zac Champ". The signature is fluid and cursive, with the first name "Zac" and last name "Champ" clearly distinguishable.

D. Zachary Champ
Director, Government Affairs
Wireless Infrastructure Association
500 Montgomery Street, Suite 500
Alexandria, VA 22314
(703) 535-7407
zac.champ@wia.org