

This correspondence is to register comments regarding the FAA's position on the impact of communications towers (radio, TV, cell phone) on migratory bird populations.

More than 138,000 such towers are registered nationwide, and so far their presence has proven lethal to millions of migrating birds annually. Many songbirds migrate at night and are killed after colliding with these towers, particularly during periods of fog, rain and low-cloud ceilings. Tower height, placement, lighting and the presence and placement of guy wires seem to influence mortality levels, but a great deal still remains unknown about the impact of tower strikes on individual bird species. Not surprisingly, the communications industry has been largely unconcerned about the problem, despite the fact that these deaths could likely be cited as a violation of the Migratory Bird Treaty Act.

As a regulatory agency, the FAA has a responsibility to investigate all facets of the issues within its purview. As such, FAA officials should:

- Begin a systematic review of communication tower and bird mortality issues;
- Institute a research program, funded by the communications industry, to identify tower placement, design and lighting conditions that result in bird mortality;
- Undertake environmental reviews of all existing towers to assess their placement and design with regard to migratory bird impacts;
- Require that all proposed towers be subjected to rigorous environmental reviews;
- Implement immediate protections based on existing knowledge, such as the voluntary tower siting and placement guidelines developed by the U.S. Fish and Wildlife Service.

I expect this comment to be regarded with the same seriousness with which it has been submitted. Thank you.

A handwritten signature in black ink, reading "John G. Smith". The signature is written in a cursive style with a large, looping initial "J".