

WT 05-326



Federal Communications Commission
Washington, D.C. 20554

September 29, 2005

Mr. Dennis P. Corbett
Leventhal Senter & Lerman PLLC
2000 K Street, NW
Suite 600
Washington, DC 20006-1809

Dear Mr. Corbett:

This letter concerns the Request for Waiver filed by the American Tower Corporation (ATC) on May 19, 2005. ATC seeks a waiver of Section 17.47(b) of the Commission's Rules, 47 C.F.R. § 17.47(b), which provides that the owner of any antenna structure which is registered with the Commission and has been assigned lighting specifications pursuant to Part 17 "(s)hall inspect at intervals not to exceed 3 months all automatic or mechanical control devices, indicators, and alarm systems associated with the antenna structure lighting to insure that such apparatus is functioning properly." Specifically, for towers utilizing the Eagle Monitoring System ("Eagle System") developed by Flash Technology, ATC seeks permission to perform an annual inspection in place of the required quarterly inspection.

In connection with this waiver request, we seek the following additional information:

1. List the fault detection functions of the Eagle System and their respective anomalies or end effects (e.g., controller outage, light failures, landline outage, etc.). Provide these results in a summary table and indicate what level (major, minor, etc.) alarm the function generates.
2. From the time the Eagle System became fully stabilized through the current date, provide a table listing specific incidents of major alarms and indicate the type of outage and the general cause. Indicate actions taken to remedy such occurrences and the number of towers involved. A major alarm indicates a fault that may lead to light or other major tower element outage. Treat the outages related to Hurricanes Katrina and Rita separately. Note that we are not requesting complete alarm data records, but only those of most significance.
3. For the same time period as in (2) above, indicate the number and the frequency of Eagle System malfunctions or failures that were and are currently being detected by quarterly inspections. When failures were detected, what was the cause of the failure? Categorize results based on the type of outage.
4. Can ATC readily identify which of its towers are equipped by an active Eagle System, and which are not? How are the newly-equipped Eagle System towers tracked?

5. Describe any diagnostic functions available to ATC, either internal or external to the Eagle System, to detect failures to the control devices, indicators, and alarm systems associated with the Eagle System. In the event of such failures, how is ATC informed?
6. In case of catastrophic failure at the NOC (i.e., the NOC is rendered inoperable), how does ATC detect outages at Eagle System equipped towers? Does ATC have a specific procedure to follow in case of this event? If so, what is it?
7. Provide a brief description and an end-to-end block diagram of the Eagle system and all of the major supporting ancillary sub-systems (e.g., internet connections, telephone lines, etc.) associated with it. Please explain to what extent ATC has control over these sub-systems.

Please provide this information no later than thirty (30) days from the date of this letter. Failure to provide this information within the prescribed period may result in processing of the waiver request without the additional information.

You may contact John Borkowski of our office at 202-418-0626 if you have any questions regarding this letter.

Thank you.

Sincerely,



Jeffrey S. Steinberg
Deputy Chief
Spectrum and Competition Policy Division
Wireless Telecommunications Bureau