

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

In the Matter of)
)
American Tower Corporation Request For) WT Docket No. 05-326
Waiver To Perform Annual Inspections In)
Place Of Quarterly Inspections Required By)
47 C.F.R. Section 17.47(b))

COMMENTS OF PCIA – THE WIRELESS INFRASTRUCTURE ASSOCIATION
ON REQUEST OF AMERICAN TOWER CORP. FOR WAIVER OF QUARTERLY
INSPECTIONS REQUIRED BY PART 17

PCIA - the Wireless Infrastructure Association¹ (“PCIA”), hereby respectfully submits its comments in response to the Wireless Telecommunications Bureau’s (“WTB”) *Public Notice* (“Notice”) in the above-captioned proceeding.² The Notice seeks comments on American Tower Corporation’s (“ATC”) request for waiver (“Request”) of Section 17.47(b) of the Federal Communications Commission’s (“FCC” or “Commission”) rules regarding inspection requirements for the owners of any antenna structures.³ Specifically, ATC asks the Commission for permission to perform annual inspections instead of the required quarterly inspections based on the fact that ATC

¹ PCIA is the principal trade association representing the wireless telecommunications and broadcast infrastructure industry. PCIA’s members own and manage telecommunications towers and antenna facilities, and own or manage more than 50,000 towers that support wireless services across the country.

² See Wireless Telecommunications Bureau Seeks Comment on the American Tower Corporation Request For Waiver To Perform Annual Inspections In Place of Quarterly Inspections Required by 47 C.F.R. Section 17.47(b), *Public Notice*, DA 06-139, (rel. Jan. 24, 2006)(*Notice*).

³ 47 C.F.R. § 17.47(b).

employs an advanced and reliable continual monitoring technology which in effect makes quarterly inspections unnecessary.

PCIA supports ATC's Request and submits that ATC has fully met the standard for grant of the requested waiver. ATC has demonstrated that the underlying purpose of Section 17.47(b) of the Commission's rules can be served just as well by its alternative approach, and it would be in the public interest to grant the Request. In granting ATC's Request, PCIA urges the Commission to indicate that it will follow this precedent for all similarly situated tower companies operating a centralized network operations control ("NOC") center that provides this functional equivalent of continual inspection.

Indeed, PCIA fully supports the suggestion in footnote three of ATC's request that the Commission completely eliminate inspections at any regular interval where a more thorough and reliable remote capability exists.⁴ This would benefit both industry and the Commission without any compromise in integrity of operations.

As indicated above, for all companies who utilize demonstrably reliable NOC technology, regular physical examinations are unnecessary. Such a requirement is inconsistent with the modern monitoring technology now deployed and imposes needless burdens on the infrastructure and carrier industries that eventually are passed on to consumers.

Respectfully submitted,

PCIA, THE WIRELESS INFRASTRUCTURE
ASSOCIATION

⁴ See Request for Waiver, WT Docket No. 05-326, filed May 19, 2005 (ATC Waiver Request) Footnote 3 at 2.

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