

WirelessEstimator.com has been requested by the undersigned, Mr. Carl Roehrs, Ms. Dinah Sheridan and Mr. Tom Walters, to submit their comments and recommendations to the Federal Communications Commission regarding:

**WT Docket No. 03-187, FCC 06-164, Notice of Proposed Rulemaking,  
“Effects of Communication Towers on Migratory Birds”**

I would like to address the financial impact of the FCC’s belief that white strobe lighting should be the preferred system for tower obstruction lighting and let others discuss whether there are any merits for even considering the lighting system change.

As required by the Regulatory Flexibility Act, the FCC said it has prepared an initial report regarding the possible significant economic impact on small businesses of the policies and rules proposed in their NPRM. They said it is set forth in Appendix A. But there are no details at all in Appendix A.

Regarding the proposed lighting change, the FCC knows that it will have a significant financial impact, but it is difficult to identify that impact because an individual or association is not able to capture enough information in the FCC’s Antenna Structure Registration database to figure out how many towers will be affected by the proposed changes when the tower is modified with a new collocation or altered in any way.

Since medium intensity white lighting is being considered as the preferred system, the cost would be based upon the existing or new tower’s height.

A CTIA spokesperson said recently in a news article that to change the lighting could cost at least \$30,000 per tower. A PCIA representative said it could cost \$100,000 to do one tower.

The expense they project might be correct for a specific tower, but the range of pricing doesn’t provide any accuracy in identifying the cost to an individual owner and the national impact on small businesses.

I’m sure that both of those associations want to be more specific in their cost projections if they are going to present them to the FCC to identify an economic hardship. However, I don’t know how they can capture this data without more information from the FCC regarding the number of structures this will affect and the structures’ height.

Costs of the equipment and installation can be provided. In example, if an owner were to change an incandescent system on a 300’ tower to a medium intensity lighting system, if the company was local, the cost would be approximately \$6,000 to \$9,000 for the work – considerably less than \$30,000.

On the other hand, if you were to change out a 1,500’ tower it would require high intensity lighting and the cost could skyrocket to \$175,000 as the article on wirelessestimator.com points out.

Until the FCC provides additional data that interested parties can use to assess the economic impact that their change would effect, no changes to obstruction lighting regulations should be considered or enacted.

Respectfully submitted  
Carl Roehrs

\* \* \* \* \*

I've read most of the comments that have been submitted to the Federal Communications Commission regarding the issue, most of them – like mine – reflexive reactions.

Everybody is entitled to their opinion, but not their own facts...unless they are substantially and scientifically presented and the FCC carefully reviews each and every presentation through qualified consultancies and industry professionals.

It's easy – without portfolio - to demonize tower owners for their callous disregard for wildlife. It's not so easy to provide scientific data that validates the American Bird Conservancy's and other avian groups' concerns.

Dinah Sheridan  
Columbus, Ohio

\* \* \* \* \*

In the three years that I've been climbing towers the only dead birds I've seen were ones the D.N.R. had put on a self supporting tower in South Carolina to keep the buzzards off the tower. The tower was directly over a few houses that were complaining of bird droppings. So the D.N.R. collected and froze road kill buzzards to keep other live birds away.

I have climbed 30-40 towers all over in Southern Louisiana after Hurricane Katrina. There were no dead birds.

I have climbed over 100 towers in South Carolina and saw no bird carcasses. Now I'm in the Northwest around Portland, and again, no dead birds. Birds usually co-exist well with the towers and rest sites.

Tom Walters  
Baxter, Minnesota