

Dear Federal Communications Commission:

I support the change in tower lighting to help protect our bird population.

Please accept these comments regarding the FCC Notice of Proposed Rulemaking on Communication Towers and Birds, WT Docket No. 03-187. The overwhelming evidence submitted to the FCC documents that the existing 90,000 antenna tower structures cause the death of millions of migratory birds, that these deaths are cumulatively significant for many birds, including Birds of Conservation Concern, and that there are readily available techniques to prevent this killing. The FCC should adopt measures immediately and stop the delays in addressing this pressing environmental issue.

New and older research documents that red steady-burning or slow-pulsing lights attract birds to towers at night and that many of the ensuing deaths are from striking guy wires. The Michigan research by Dr. Joelle Gehring documents that 90% of bird kills are caused by guy wires. Turning off red steady-burning lights at night and using red or white strobe lights reduced bird kills by approximately 72%.

The FCC can choose to continue to delay in this matter and continue to violate NEPA, ESA, and the MBTA. Or, the FCC can solve this problem and adopt provisions for the co-location of towers, the use of strobe lights exclusively on all towers, and for not allowing guy wires on new towers where possible. I urge the FCC to act NOW to prevent the deaths of millions of birds at communication towers each year.

Sincerely,  
Carol Shouldice