

Michigan Natural Features Inventory  
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July 24, 2007

Sec. Marlene H. Dortch  
Federal Communications Commission  
445 12th, SW  
Washington, D.C. 20554

Dear Secretary Marlene H. Dortch,

This letter is submitted as part of the ex parte process for WT Docket No. 03-187.

I appreciate the opportunity to clarify several statements that were made about my Michigan bird collision research by Woodlot Alternatives.

Woodlot Alternatives expressed interest in gaining access to the raw data that I collected in Michigan, suggesting there was the potential for me to mislead users of those data by only presenting summary statistics. I am a conservation scientist who conducts research for the purposes of testing hypotheses, answering scientific questions, and using those results to help resolve conservation related issues. Progress toward conservation of natural resources would not necessarily be achieved via misusing data, or misleading data users. Additionally, the independent nature of my position as a university research scientist removes any economic ties to certain results or conclusions/interpretations. Within the realm of publishing university science it is not appropriate to release raw data until those data have been published, a process that my co-authors and I have initiated. Requests to release raw data prior to publishing are highly uncommon. The research methods used in the Michigan study have been clearly defined in reports and scientific presentations if others, such as Woodlot Alternatives, are interested in repeating the study.

In addition, Woodlot Alternatives had concerns that certain data points (i.e., towers) within the Michigan sample were involved in additional or fewer avian collisions due to extraneous variables. As my reports specified, two towers in the study (both guyed and 146 m Above Ground Level (AGL)) were selected non-randomly, based on a specific question of the research funder.

One was located in an area that was anecdotally suggested to have high levels of avian movement during migration and one was located in close proximity to the breeding area of an endangered species. The former tower had a mean of 10 bird collisions per study season and the latter a mean of 8.5 bird collisions per study season, these means can be compared to the mean of 8.2 bird collisions for towers with the same lighting system, height category and support system (guyed). There is nothing to suggest that these two towers were outliers in the dataset, as Woodlot Alternatives suggested. Another concern regarding the specific towers sampled in the Michigan study was the potential for the variation of tower heights within the range of 116-146 m AGL to introduce a confounding variable when making comparisons. With exception of two guyed towers, all of the towers in the 116-146 m AGL height category were 146 m AGL. Again, there was nothing to suggest that these towers were outliers in the dataset.

Woodlot Alternatives also suggested that I attempted to artificially inflate the number of bird collisions at towers by sampling during the time periods when avian collisions were most likely to occur. The goals of this study included comparing avian fatalities among towers with different support systems, height, and lighting systems. While sampling for avian fatalities under the study towers during periods of low avian collisions may have decreased the monthly average of collisions documented, it was not the intent of the Michigan study to quantify bird kills at towers throughout the entire year. Instead, the intent was to compare different types of towers simultaneously. Therefore my sampling time periods were appropriate for the scientific question asked.

In an attempt to discredit the Michigan research based on “small sample size”, Woodlot Alternatives also mistakenly stated that I studied only six towers in 2005. My reports from the study (including those in my April 2007 comments submitted as part of this NPRM) state that 21 towers were studied in 2 migration seasons in 2005, not six towers.

Finally, the Michigan study determined that while there were no differences in avian fatalities among towers with only blinking lights (independent of color and type of blinking light), there were statistically fewer avian collisions at these towers when compared to towers that included non-blinking lights (L-810) at night. Currently the only FAA approved nighttime tower lighting system lacking non-blinking L-810 lights is the white strobe system. Therefore, the statement that Michigan data “raze the rationale for FCC’s proposed preference for white strobes.” is incorrect and misleading.

Thank you for the opportunity to participate in the NPRM process and thereby clarify the findings, the integrity, and the correct application of the Michigan study of bird collisions with communication towers.

Sincerely,  
Joelle Gehring, Ph.D.,  
Senior Conservation Scientist, Zoology  
Michigan Natural Features Inventory