

RE: Docket Numbers 08-61 and 03-187

Dear Secretary Dortch,

I am submitting these comments on behalf of the Naugatuck Valley Audubon Society. We are located in Derby, CT and we have over 380 members. We urge the FCC to adopt new rules for registering communications towers and evaluating their impacts on birds. We urge the FCC to comply with the National Environmental Policy Act, the Endangered Species Act, and the Migratory Bird Treaty Act. Well over 4 to 5 million birds are estimated to be killed by communications towers each year. Most of the birds are killed in the fall and spring when night migrating birds are attracted to the safety lights on the towers. Modifications to the requirements for these towers can make a significant reduction in the danger they represent to migrating birds. Research has shown that using steady-burning lights, reducing the heights of new towers and using unguyed towers would have a significant impact on bird deaths caused by the towers.

We are asking you to work to implement these solutions to reduce the unnecessary negative impact caused by communication towers on our migrating bird populations.

Thank you,

Dennis Kocyla

President

Naugatuck Valley Audubon Society