

From: Michael Marcus [mailto:mjmarcus@marcus-spectrum.com] Sent: Monday, October 19, 2009 9:40 AM To: Ruth Milkman Subject: "Shot clock" and antennas Ruth, I have been reading your statements on antennas, local governments and the "shot clock" proposal. (I assume this is not subject to ex parte rules at present, but if it is, tell me what the docket number is and I will file). I have been saying for a while that local opposition is a problem for both CMRS and other WTB-regulated services. Indeed, I think that in the next decade the total antenna requirement for suburbia will probably be of the order of 20 antennas (not towers) per square mile considering CMRS, Part 90, and point-to-multipoint systems. I think WTB should think about this point of view of total antenna requirements and come up with its own viewpoints on total antenna requirements. The cellular industry has a viewpoint that they have "white hats", and the local governments are unfairly picking on them. Part of this problem is that the cellular industry has been rather inconsiderate of their neighbors with respect to antenna designs. This was pointed out at the 8/12 broadband hearing by Jake MacLeod of Bechtel, not a "tree-hugging" liberal. I suggest you start telling the cellular industry that it will be hard to sell the shot clark approach unless they indicate some flexibility also. After all, as Charlie Ferris' mentor, Tip O'Neill, said "all politics is local". Too many cell towers look like "they were designed by engineers". While industry has used neighborhood compatible designs when forced to, they generally used the "lattice" design that Mr. MacLeod indicted has passed its usefulness. To deescalate this problem industry probably has to start thinking about new types of designs as the default design. It is interesting that there has been no domestic interest in Ericsson's "Tower Tube" design approach. While the Ericsson approach is certainly no the ultimate solution, it shows the type of creative thinking at the interface of electromagnetic technology and architecture that is possible. Here are some of my writings on this topic that your staff might want to review: <http://www.marcus-spectrum.com/documents/PCIA109.pdf>