

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
2004 and 2006 Biennial Regulatory Reviews)	WT Docket No. 10-88
Streamlining and Other Revisions of)	
Parts 1 and 17 of the Commission’s Rules)	
Governing Construction, Marking and)	
Lighting of Antenna Structures)	
)	
Amendments to Modernize and Clarity)	RM 11349
Part 17 of the Commission’s Rules Concerning)	
Construction, Marking and Lighting of)	
Antenna Structures)	

COMMENTS

TowerSentry, LLC (“TowerSentry”),¹ submits these Comments in response to the Commission’s Notice of Proposed Rulemaking, FCC 10-53 (released April 20, 2010) (“NPR”). In the NPR, the Commission sought comment on what changes, if any, should be made to Section 17.47(b) of the Commission’s rules. TowerSentry requests that the Commission adopt changes to Part 17 permitting tower owners and monitoring stations that meet certain criteria to be exempt from the Commission’s quarterly tower light inspection rule. The criteria for exemption should be based on a combination of UL® criteria required of Central Monitoring Stations and also specific criteria that TowerSentry previously presented to the FCC to create a procedure by which users of the TowerSentry Monitoring System could obtain waiver of Section

¹ TowerSentry is the oldest independent tower light monitoring company in existence. The company was established for the sole purpose of monitoring tower lights and associated on-site equipment. Its client base is comprised of tower owners in the tower, cellular, cable, broadcast, gas, and power industries, as well as government agencies, municipalities, public and private utilities, and private owners. By Memorandum Opinion and Order, *In the Matter of TowerSentry LLC Request for Waiver of 47 C.F.R. § 17.47(b) and Joint Petition of Diamond Communications LLC and Diamond Towers LLC for Waiver of 47 C.F.R. § 17.47(b)*, 24 FCC Rcd 10274 (WTB 2009), the Commission established an expedited procedure by which users of the TowerSentry Monitoring System may obtain waiver of Section 17.47(b) of the Commission’s rules in order to perform annual instead of quarterly tower inspections.

17.47(b) regarding quarterly tower light inspections. TowerSentry proposes the following requirements be met prior to a tower owner being exempt from the Commission's quarterly tower light inspection requirement:

1. At a minimum, the on-site tower light monitoring equipment should monitor the following:

- a. For systems lit by White Strobe:
 - i. White strobe failure
 - ii. AC power failure
 - iii. Indicator of Day / Night transition
- b. For systems lit by Red Strobe:
 - i. Red strobe failure
 - ii. Marker/Sidelight(s) failure
 - iii. AC power failure
 - iv. Indicator of Lights On / Off
- c. For systems lit by a combination of Red and White Strobe:
 - i. Red strobe failure
 - ii. White strobe failure
 - iii. Marker / Sidelight failure
 - iv. AC power failure
 - v. Indicator of Day / Night transition
- d. For systems lit by a combination of White Strobe with Red Incandescent:
 - i. Red beacon failure
 - ii. Red flasher failure

- iii. Marker / Sidelight(s) failure
 - iv. White strobe failure
 - v. AC power failure
 - vi. Indicator of Day / Night transition
- e. The same requirements should apply to all LED lit systems.
2. All on-site monitoring equipment should provide notification to the monitoring station of the above events without having to be “polled.” This will insure rapid response times for all failures and insure that the light system is operating in the correct mode (day / night, lights on / off).
3. **Central Station Equipment.** The monitoring center should be UL approved or meet the following minimum criteria:
- a. **Servers.** The Main Server shall have a “Hot” Standby, and a third “Hot” back up system. In the event the main server fails, the second server should automatically and immediately take over. If the second server fails, a third server automatically takes over. All events, history, and logs are mirrored through the clustering of all three servers. All servers should operate behind an enterprise class firewall. This system meets UL certification requirements for central stations that provide burglary and fire alarm monitoring. Aviation safety should meet these minimum requirements.
 - b. **Data Backup.** Backup of all data should be done at least hourly, either through automatic or manual means. Two master backups should be performed daily. One should be kept on-site but “off line.” The other should be kept off-site. These backups can be used in the event that the current data is corrupted.

- c. **Receivers.** For Central Stations that utilize analog or digital receivers, two receivers shall be required – one main and one backup.
- d. **Backup Power.**
 - i. Uninterruptible Power Supplies. All servers should be supplied AC power through multiple Uninterruptible Power Supplies (“UPS”). Multiple UPS units should be used to provide instant uninterrupted power to all servers and workstations. They can sustain power for several hours if needed.
 - ii. Standby Generator. A standby generator should be required to provide additional long term back-up power. The generator should constantly monitor utility supplied power. In the event of a power failure, the generator should automatically start and transfer power for the central station from public utility to generator power. The standby generator should be capable of running a minimum of five days without refueling. The generator should be oversized operating at a maximum of 30% of its capacity. A back up manual generator should also be on-site.
- e. **Dead Man Alarm.** Some method should be provided to detect if the monitoring system at a specific tower site goes off-line. This can be done by “polling” the site for each mode of operation, or by software at the Central Monitoring Station that tracks each tower site.
- f. **Monitoring Center Staffing.** The monitoring center should be staffed 24 / 7 with live personnel to insure that the system is operating correctly and to be able to immediately respond to events requiring a Notice to Airmen (NOTAM).

All monitoring personnel should be specifically trained to monitor tower lights. This training should include a basic understanding of tower light systems. In addition, monitoring personnel should be familiar with current FAA advisories and current FCC rules and regulations regarding the requirements of tower lighting and the operators' responsibilities as it relates to timely reporting of light outages.

- g. Emergency Backup Central Monitoring Station.** The monitoring center should have either its own back-up monitoring station at a separate location or a written agreement with a Central Monitoring Station to provide back-up monitoring in the event of the catastrophic failure of the primary monitoring station. The back-up monitoring station should meet all of the requirements of the primary station.
- 4. Emergency Procedures and Call List.** An emergency plan should be written describing the procedures to be followed if the ability to monitor is interrupted for any reason. Part of this document should include the names and emergency (24 / 7) phone numbers for all companies that provide or assist in providing data from the tower site to the Central Monitoring Station. The call list should also include the local fire and police department, public utility, and any other company or group that helps to sustain the Central Monitoring Station.
- 5. Certification.** TowerSentry requests that all monitoring stations or Central Monitoring Stations be certified either by UL, PCIA, or another similar organization to insure that aviation safety is not compromised by inferior equipment or monitoring techniques.

Respectfully submitted,

TOWERSENTRY, LLC

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July 20, 2010