

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

In the Matter of)	
)	
Pleading Cycle Established for Comments on Review of Wireless Telecommunications Bureau Data Practices)	WT Docket No. 10-131
)	
)	
2004 and 2006 Biennial Regulatory Reviews— Streamlining and Other Revisions of Parts 1 and 17 of the Commission’s Rules Governing Construction, Marking and Lighting of Antenna Structures)	WT Docket No. 10-88
)	
)	
Amendments to Modernize and Clarify Part 17 of the Commission’s Rules concerning Construction, Marking and Lighting of Antenna Structures)	RM 11349
)	

COMMENTS OF PCIA—THE WIRELESS INFRASTRUCTURE ASSOCIATION

PCIA—The Wireless Infrastructure Association (“PCIA”) respectfully submits these comments in response to the above captioned proceeding regarding the Wireless Telecommunications Bureau’s data collection efforts.¹ PCIA supports the Commission’s efforts to modernize the collection and dissemination of data through its antenna structure registration (“ASR”) process. Specifically, PCIA supports a proposed rule change to allow “antenna structure owners . . . to notify tenant licensees and permittees that the structure has been

¹ Pleading Cycle Established for Comments on Review of Wireless Telecommunications Bureau Data Practices, WT Docket No. 10-131, *Public Notice*, DA 10-1223 (rel. June 29, 2010).

registered, and give the tenant licensees and permittees the antenna structure’s registration number along with the link for the Commission’s antenna structure registration website.”²

The current process and the rules governing the notification of antenna structure tenants of ASR changes or updates are remnants of the era of paper filing, and are now burdensome for both the Commission and antenna structure owners. Under current rules, antenna structure owners must file Form 854 to modify an ASR for a tower.³ Upon receipt, the Commission generates a pdf of Form 854R, which is a “Reference Copy” and confirms receipt of the filing, but then mails a paper copy to the antenna structure owner. The antenna structure owner is then required to mail the paper copy of the 854R received from the Commission to its tenants.⁴ This is inefficient and burdensome for both the antenna structure owner and the Commission.⁵

In its recent *Notice* on its part 17 rules, the Commission proposed to modify its rules to allow antenna structure owners to simply supply tenants with a copy of a link to the ASR website and the relevant ASR number.⁶ The tenant may then view the 854R through the ASR website. This change alleviates a significant and costly administrative burden for the Commission and antenna structure owners. PCIA supports this change, and urges the Commission to move quickly to issue rules upon the completion of the reply comment period in the relevant proceeding.

² *In re* 2004 and 2006 Biennial Regulatory Reviews—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 Clarify Part 17 of the Commission’s Rules concerning Construction, Marking and Lighting of Antenna Structures, WT Docket No. 10-88, RM 11349, *Notice of Proposed Rulemaking*, FCC 10-53, at ¶ 43 (rel. Apr. 20, 2010) (“Part 17 Rulemaking”).

³ 47 C.F.R. § 17.4(b).

⁴ 47 C.F.R. § 17.4(f).

⁵ This burden is greatly compounded when a neutral host tower owner acquires a large portfolio of registered antenna structures. The FCC may have to process, print, and mail thousands of Form 854Rs to the neutral host, and the neutral host may be required to copy and mail thousands of Form 854Rs to its tenants.

⁶ Part 17 Rulemaking ¶ 42–43.

Respectfully submitted,

PCIA—THE WIRELESS INFRASTRUCTURE ASSOCIATION

By: _____/s/_____

Michael T.N. Fitch, Esq.

President and CEO

Connie Durcsak

Senior Director of Industry Affairs

Executive Director, The DAS Forum

Michael D. Saperstein, Jr.

Director of Government Affairs

Brian M. Regan

Government Affairs Counsel

901 N. Washington St., Suite 600

Alexandria, VA 22314

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