

WT Docket Nos. 03-187 and 08-61

December 13, 2010

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Received & Inspected
DEC 20 2010
FCC Mail Room

RE: Migratory Birds and Communications Towers

As a supporter of Defenders of Wildlife and someone who cares about migratory birds, I am happy to see that the Federal Communications Commission (FCC) is finally conducting an environmental review of its tower registration program.

I strongly urge you to conduct an environmental impact statement rather than an environmental assessment of the impacts of communication towers on birds.

I also urge you to conduct this review before more towers are constructed as part of the broadband expansion.

According to the Fish & Wildlife Service, each year at least five million birds are killed by communications towers and related structures across the United States. Attracted by the steady glow of lights, millions of birds are killed during their annual night migrations as they collide with communications towers and related structures. But many of the deaths could be prevented.

Around 230 species of birds, over one-quarter of all avian species found in the U.S., have been documented as being killed by towers. Many of these species are in decline. Several species are suffering mortality equivalent to several percent of their estimated total population size.

The FCC not only has the legal authority to regulate these antenna structures but also the legal obligation to do so.

Federal laws -- including the National Environmental Policy Act, the Endangered Species Act, and the Migratory Bird Treaty Act -- require the FCC to adopt measures to prevent, or at least minimize, bird fatalities caused by FCC registered antenna structures.

As the FCC moves forward with the environmental review of its tower program, please consult with the U.S. Fish and Wildlife Service and prepare a Memorandum of Understanding that outlines how the FCC will meet its obligations under the Migratory Bird Treaty Act in order reduce bird deaths from antennas and structures regulated by the FCC.

Thank you for your consideration and help on behalf of America's irreplaceable wildlife.

Yours truly,



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