

March 31, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554  
*Via Electronic Filing*

Re: *Ex Parte* Presentation, WC Docket No. 07-245; GN Docket 09-51

Dear Ms. Dortch:

As the Commission moves towards final rules governing utility pole attachments, the DAS Forum, a membership section of PCIA—The Wireless Infrastructure Association offers additional data on the positive impact that regulated rates, nondiscriminatory pole top access, and reasonable make ready timelines will have on wireless network deployment and access. With lower barriers to DAS deployment, consumers will benefit significantly from improved coverage and capacity that is enabled by wireless deployments on utility poles.

DAS providers will benefit from the ability to cover a larger geographic area with fewer nodes, in less time, and at reasonable rates. The savings and deployment efficiency generated from the implementation of these rules will be reinvested in additional DAS networks, thus increasing the proliferation of DAS and further enhancing the more efficient use of spectrum. Based on data and information the DAS Forum has received from its member companies, the DAS Forum predicts that with regulatory certainty for wireless attachments to utility poles including regulated rates, nondiscriminatory access to pole tops, and reasonable make ready timelines:

- **The number of nodes in operation could double to 20,000 by the end of 2012, with an estimated total of over 150,000 nodes by the end of 2017.** This will result from improved regulatory certainty and economic feasibility across the country, including in territories where DAS deployments previously were infeasible or denied. Importantly, this growth in the number of nodes will also result in a concomitant decrease in the nodes needed to cover a given geography due to the coverage benefits of pole top versus communications space antennas.
- **An estimated cumulative total of over \$5 billion in capital savings through 2017** could result from the difference in the number of pole top node counts versus communications space node counts necessary to achieve the same geographic coverage area.
- **Cumulative annual capital expenditures by DAS providers could double by the end of 2012 to \$2 billion, with an estimated cumulative total of over \$15 billion by 2017.** This figure is based on the estimated growth in node counts over the five year period from 2012 to 2017.
- **Spectrum efficiency within a given service area may increase by up to 130%.** As the record demonstrates, DAS enables spectrum efficiency by facilitating the reuse of existing spectrum resources in a given service area, thereby improving coverage and capacity without additional spectrum.

The Commission has the opportunity to finally give substance to the legal rights of wireless attachers to utility poles, to the benefit of wireless users across the country. Importantly, if these rights are extended

to non-FCC states the impact would be even more significant. Full access rights, including to the pole top, regulated rates and timely access are essential to furthering the business case for DAS and other wireless attachments to utility poles as a highly valuable component of the nation's wireless infrastructure.

Pursuant to Section 1.1206 of the Commission's rules, a copy of this letter will be filed via ECFS with your office. Please do not hesitate to contact the undersigned with any questions.

Sincerely,

          /s/            
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