



May 29, 2012

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

Re: *Ex Parte* Communication, WT Docket No. 08-61; WT Docket No. 03-187

Dear Ms. Dortch,

On May 24, 2012, Paul Roberts and Jenna Metzник of American Tower Corporation, Robert Vitanza of AT&T, Monica Gambino and Christine Verre of Crown Castle, Tony Traini and Ray Rothermel of Sprint Nextel, Ed Roach of SBA Communications and Zac Champ and the undersigned of PCIA—The Wireless Infrastructure Association (“Parties”) met with Aaron Goldschmidt, Dan Abeyta and Don Johnson from the Wireless Telecommunications Bureau.

The Parties thanked the Federal Communications Commission (“FCC” or “Commission”) for its recent education efforts regarding the new filing requirements and online system for the FCC’s Antenna Structure Registration (“ASR”) program. The Parties inquired about compliance with the Interim ASR Rules,<sup>1</sup> including how the new national and local pre-application notification processes will work in conjunction with one another – particularly in situations where the date of the local notice changes – and what processes and criteria Commission staff will use in reviewing Requests for Environmental Review filed during the notification process.

Additionally, the Parties inquired about how to update minor, non-administrative changes in the information for a registered tower in the new ASR system, including small corrections in tower coordinates and height that do not involve structural changes, and about non-registered, existing towers that will require ASR registration due to new Federal Aviation Administration requirements.

Further, to ensure that the wireless industry’s internal systems are in compliance with the new data requirements and work with the new filing system, the parties urged the Commission to allow for more time and access to the new ASR filing system. Doing so would grant the industry vital hands-on experience with the new ASR system, reduce the number of integration errors at launch and provide the industry with the knowledge necessary to comply with the Interim ASR Rules.

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<sup>1</sup> *In re* National Environmental Policy Act Compliance for Proposed Tower Registrations, Effects of Communications Towers On Migratory Birds, *Order on Remand*, 26 FCC Rcd 16700 (2011).

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

Sincerely,

          /s/            
Jonathan M. Campbell  
Director, Government Affairs  
PCIA—The Wireless Infrastructure Association  
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Alexandria, VA 22314

Cc: Aaron Goldschmidt  
    Dan Abeyta  
    Don Johnson