



July 23, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554
Via Electronic Filing

Re: Ex Parte Communication, WT Docket Nos. 08-61, 03-187

Dear Ms. Dortch,

On July 19, 2012, Paul Roberts and Jenna Metzник of American Tower, Monica Gambino and Christine Verre of Crown Castle, Ed Roach of SBA Communications, and D. Zachary Champ and the undersigned of PCIA—The Wireless Infrastructure Association (“Parties”) met with Jeffrey Steinberg, Aaron Goldschmidt, and Mania Baghdadi of the FCC’s Wireless Telecommunications Bureau.

Parties discussed the FCC’s Antenna Structure Registration (“ASR”) program and its recently implemented interim rules.¹ A month after implementation of the interim rules, the Parties noted several compliance issues that warrant the FCC’s attention. The Parties described instances where existing wireless infrastructure that was not previously required to be filed with the ASR program but must do so now at the request of the Federal Aviation Administration, particularly those in proximity to FAA NAVAID facilities. The Parties also noted inconsistencies in the calculation of a “substantial increase” in the height of an existing tower within the online ASR system as compared to the Nationwide Programmatic Agreement for the Collocation of Wireless Antennas.² Finally, Parties highlighted barriers to the deployment of temporary cell sites created by the ASR program; specifically, even with advance notice, the nature of temporary cell sites and the purposes they serve may require them to be moved within its intended service area on short notice, which can be adversely affected by ASR filing requirements.

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 Campbell
Director, Government Affairs
PCIA—The Wireless Infrastructure Association
901 N. Washington St., Suite 600
Alexandria, VA 22314

Cc: Jeffrey Steinberg, Aaron Goldschmidt, Mania Baghdadi

¹ *In re National Environmental Policy Act Compliance for Proposed Tower Registrations, Effects of Communications Towers on Migratory Birds*, WT Docket Nos. 08-61, 03-187, Order on Remand, 26 FCC Rcd 16700 (2011).

² Nationwide Programmatic Agreement for the Collocation of Wireless Antennas (2001), *available at* 47 C.F.R. Part I, Appendix B; *see also* Federal Communications Commission, Fact Sheet: Antenna Collocation Programmatic Agreement, (July 10, 2002), *available at* http://hraunfoss.fcc.gov/edocs_public/attachmatch/DA-02-28A1.pdf.