

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

In the Matter of	)	
	)	
Amendment of Part 101 of the Commission’s	)	
Rules to Facilitate the Use of Microwave for	)	
Wireless Backhaul and Other Uses and to	)	WT Docket No. 10-153
Provide Additional Flexibility to Broadcast	)	
Auxiliary Service and Operational Fixed	)	
Microwave Licensees	)	
	)	
Petition for Rulemaking filed by Fixed	)	
Wireless Communications Coalition to Amend	)	
Part 101 of the Commission’s Rules to	)	RM-11602
Authorize 60 and 80 MHz Channels in Certain	)	
Bands for Broadband Communications	)	

**COMMENTS OF  
PCIA—THE WIRELESS INFRASTRUCTURE ASSOCIATION**

**I. INTRODUCTION**

PCIA—The Wireless Infrastructure Association (“PCIA”)<sup>1</sup> hereby submits these comments in the above-captioned proceeding.<sup>2</sup> PCIA urges the Federal Communications Commission (“Commission”) to allow two foot antennas in the 13 GHz band to the extent that is technically feasible. Wireless infrastructure deployment sets the stage for job creation, better education, better healthcare, and ubiquitous access to information.<sup>3</sup> Consumers recognize this

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<sup>1</sup> PCIA is a non-profit national trade association representing the wireless infrastructure industry. PCIA’s members develop, own, manage, and operate over 120,000 towers, rooftop wireless sites, and other facilities for the provision of all types of wireless services.

<sup>2</sup> *In re* Amendment of Part 101 of the Commission’s Rules to Facilitate the Use of Microwave for Wireless Backhaul and Other Uses and to Provide Additional Flexibility to Broadcast Auxiliary Service and Operational Fixed Microwave Licenses; Petition for Rulemaking filed by Fixed Wireless Communications Coalition to Amend Part 101 of the Commission’s Rules to Authorize 60 and 80 MHz Channels in Certain Bands for Broadband Communications, WT Docket No. 10-153, RM-11602, *Second Report and Order, Second Further Notice of Proposed Rulemaking, Second Notice of Inquiry, Order on Reconsideration, and Memorandum Opinion and Order*, FCC 12-87 (Aug. 3, 2012) (“*Second R&O*”).

<sup>3</sup> *See generally* Comments of PCIA—The Wireless Infrastructure Association and The DAS Forum (A Membership Section of PCIA), WC Docket No. 11-59 (July 18, 2011).

need, as evidenced by the explosive growth in mobile data usage in the United States and worldwide.<sup>4</sup> Yet, obstacles to deployment remain embedded in state and local regulatory policies. It is vitally important that the Commission continue to promote wireless infrastructure buildout by educating state and local jurisdictions on the application of federal law, as well as by honing its own rules and policies.

In its *Second R&O*, the Commission permitted smaller backhaul antennas to be deployed in the 6, 18, and 23 GHz bands because it recognized that smaller antennas have many cost-saving benefits that, in turn, promote investment in wireless infrastructure deployment.<sup>5</sup> These same cost-saving benefits will inure to smaller antennas in the 13 GHz band. Moreover, smaller antennas are more likely to fall within the purview of section 6409 of the Middle Class Tax Relief and Job Creation Act of 2012 (“MCTRA”), which enables collocation by right.<sup>6</sup> For these reasons, the Commission will take another key step toward meeting the mobile communications needs of American citizens by permitting a decrease in the size of wireless antennas in the 13 GHz band.

## **II. SMALLER BACKHAUL ANTENNAS CAN REDUCE DEPLOYMENT COSTS AND BARRIERS AT THE STATE AND LOCAL LEVEL**

Modifying Commission rules to permit smaller backhaul antennas directly promotes wireless broadband buildout, increasing coverage and capacity throughout the country.<sup>7</sup> PCIA and other commenters have noted that smaller antennas are more cost effective because they

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<sup>4</sup> *In re Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion, and Possible Steps To Accelerate Such Deployment Pursuant to Section 706 of the Telecommunications Act of 1996, as Amended by the Broadband Data Improvement Act*, GN Docket No. 11-121, *Eighth Broadband Progress Report*, FCC 12-90, ¶ 33 (rel. Aug. 21, 2012).

<sup>5</sup> *Second R&O* ¶ 18.

<sup>6</sup> Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, § 6409 (2012).

<sup>7</sup> Comments of PCIA—The Wireless Infrastructure Association, WT Docket No. 10-153, RM-11602, at 2-3 (Oct. 4, 2011); Comments of PCIA—The Wireless Infrastructure Association, WT Docket Nos. 10-153, 09-106, 07-121, at 2 (Oct. 25, 2010).

reduce transportation and installation costs.<sup>8</sup> In addition, the cost of leasing space on towers can be reduced with smaller antennas.<sup>9</sup> Leasing prices are generally based on the size and loading of the antenna to be installed. Therefore, smaller antennas proportionally decrease the cost of the lease.

Federal law now provides another advantage to decreased antenna size. Section 6409 of the MCTRA permits “collocation by right.”<sup>10</sup> Section 6409 has two elements. First, it applies to any application for an eligible facility.<sup>11</sup> An eligible facility includes, but is not limited to, the collocation of a backhaul antenna on an existing tower structure.<sup>12</sup> Second, the equipment being collocated must not substantially change the physical dimensions of an existing tower or base station.<sup>13</sup> If both elements are met, the application must be approved.<sup>14</sup> Smaller backhaul antennas make it significantly easier for applicants to meet section 6409’s criteria because they are less likely to create a “substantial[] change in the physical dimensions of [the] tower or base station.”<sup>15</sup> A smaller antenna requires less structural support and creates less wind loading than a larger antenna. Therefore, applicants who deploy smaller antennas are more likely to obtain the ability to collocate those antennas by right. This speeds deployment by streamlining state and local review processes for the collocation of wireless backhaul equipment to existing wireless infrastructure.

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<sup>8</sup> *Second R&O ¶¶ 15-17.*

<sup>9</sup> *Id.*

<sup>10</sup> Middle Class Tax Relief Act § 6409.

<sup>11</sup> *Id.* § 6409(a)(1).

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

<sup>14</sup> *Id.* (“[A] State or local government may not deny, and shall approve...”).

<sup>15</sup> *Id.*

### III. CONCLUSION

For the foregoing reasons, PCIA urges the Commission to adopt rules, to the extent technically feasible, to allow two foot antennas in the 13 GHz band. Doing so will streamline the collocation review process for these antennas, and allow wireless service providers to efficiently utilize existing infrastructure.

Respectfully submitted,

PCIA – THE WIRELESS  
INFRASTRUCTURE ASSOCIATION

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