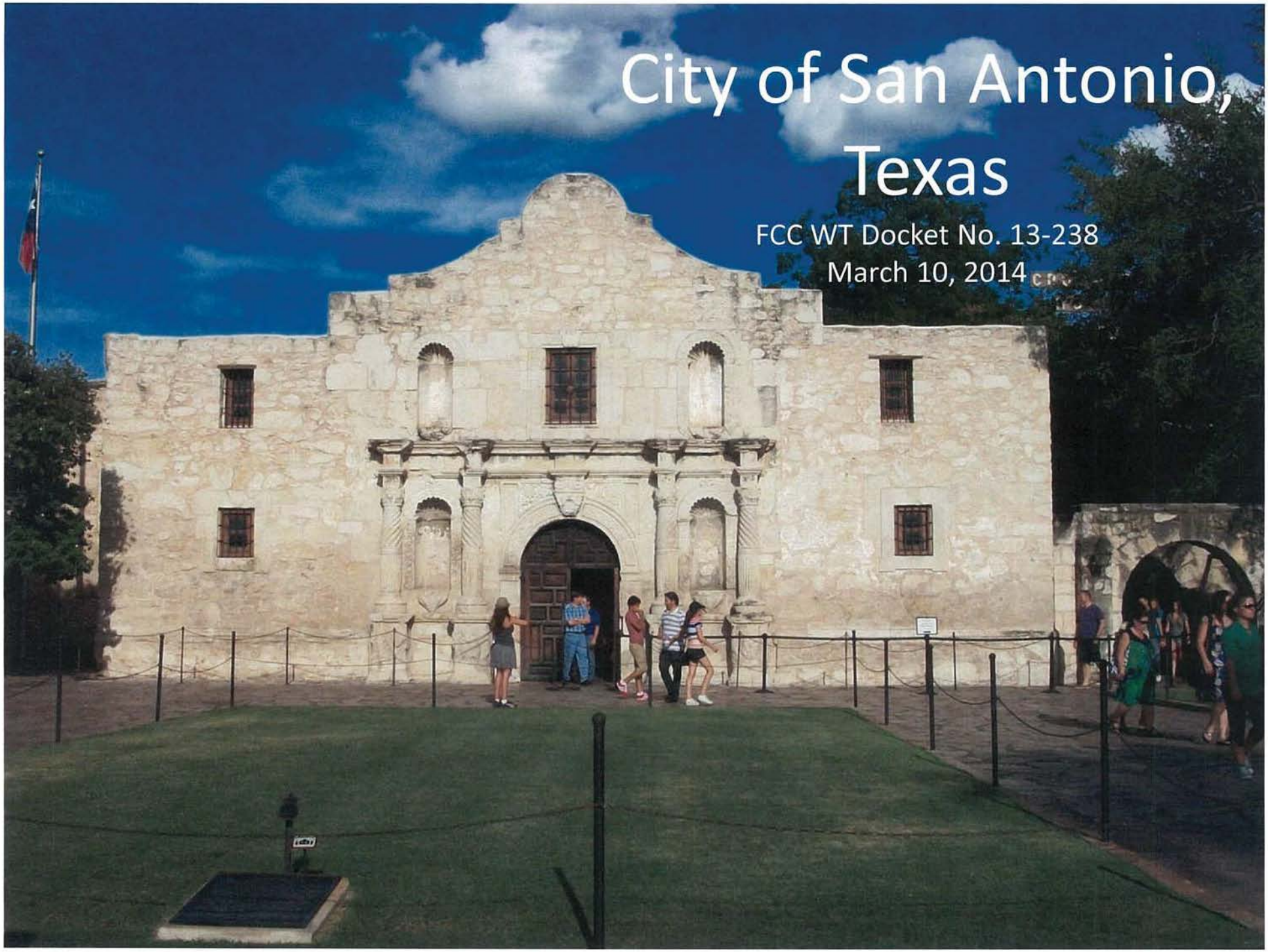
City of San Antonio, Texas

FCC WT Docket No. 13-238

March 10, 2014

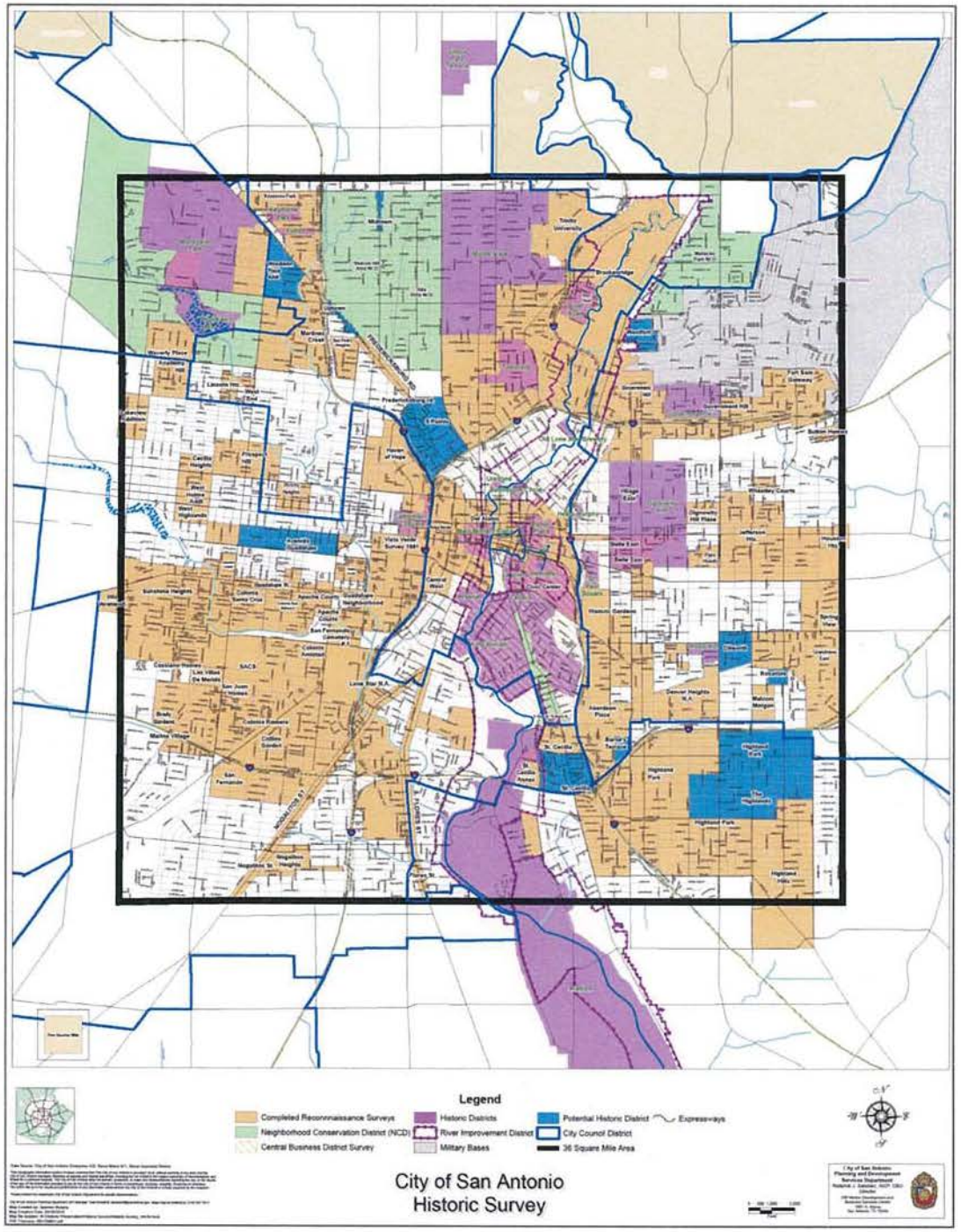


San Antonio Recognizes the Importance of Wireless and Broadband Deployment

- The City has granted 100s of collocation requests in the last 3 years, alone
- The City has approved the installation of DAS and small cells
- The City leases City-owned property for tower siting and collocation in all zones, including residential zones
- Subject to building code and other public safety requirements, the City permits new wireless facilities and collocations as of right in industrial and non-historic commercial zones

Rich Historic Resources

- Including—
  - Over 2000 individual landmarks
  - 27 different locally designated historic districts
  - 19 sites on the National Register of Historic Places
  - Designation of 5 historic missions as UNESCO World Heritage Sites pending
- San Antonio is a popular tourist destination with over 28 million visitors each year
- City subjects alterations (including wireless facilities) in historic and riverfront areas to review and approval


Legend
Completed Reconnaissance Surveys
Neighborhood Conservation District (NCD)
Central Business District Survey
Historic Districts
River Improvement District
Military Bases
Potential Historic District
Expressways
City Council District
36 Square Mile Area
City of San Antonio
Historic Survey

San Antonio River Walk

The elevator in the background is the location of a small cell tower, approved through the City's review process.

St. Paul Square

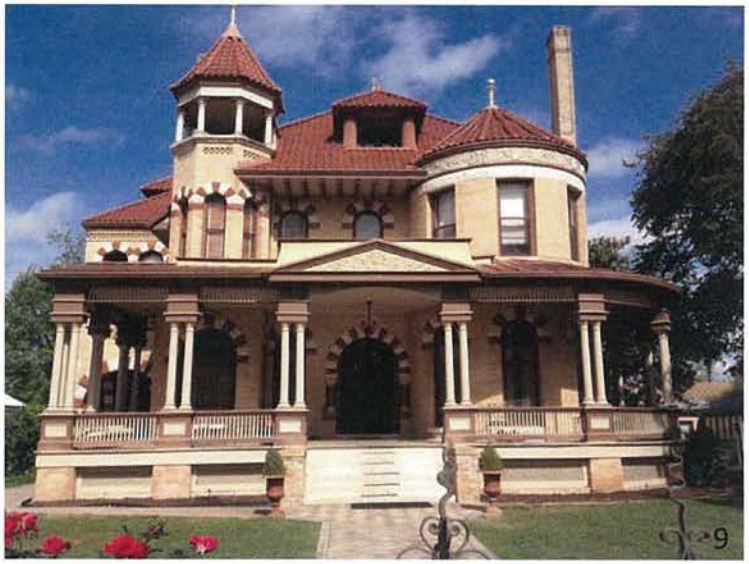
A commercial historic district.

River Walk Museum Reach

Mission Concepcion

Homes in Primarily Residential Historic Districts

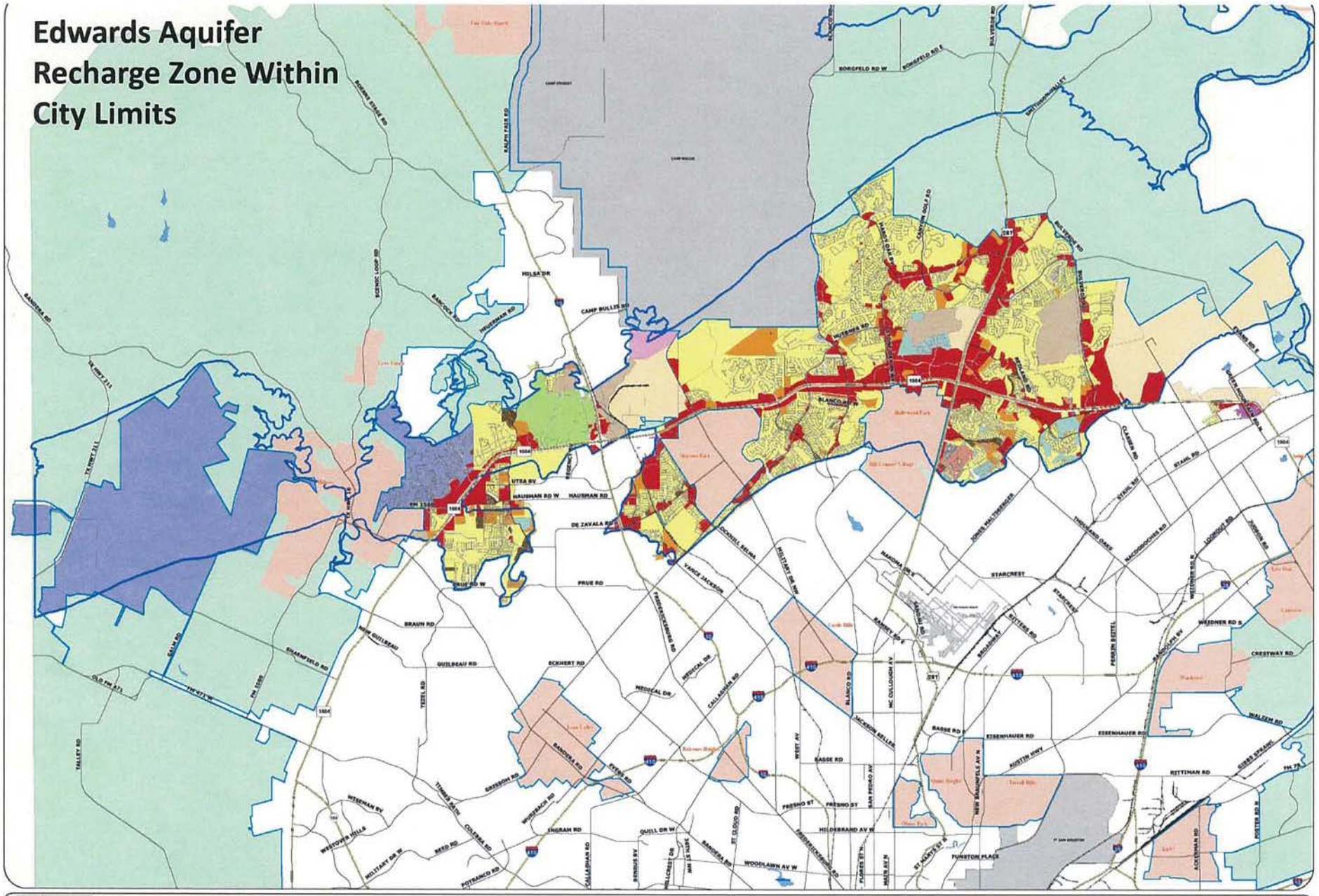
Historic districts are typically created through a public process and result from a great community effort to protect an area.



Environmental and Public Safety Concerns

- Edwards Aquifer: the City's primary water source
  - Edwards Aquifer Authority (Texas agency)
  - San Antonio City Code--imposes conditions on all developments in Aquifer Recharge Zone to prevent leakage into Aquifer
- Tower heights, set backs, and safety analyses protect persons and property from potential injury and damage from a falling tower

Edwards Aquifer Recharge Zone Within City Limits



City of San Antonio
ERZD Zoning District.

Conclusion

- San Antonio has successfully balanced widespread wireless and broadband deployment with the preservation of historic, cultural, and environmental resources and the protection of public safety

- The FCC should not construe Section 6409(a) to inhibit the City's ability to impose historic preservation, environmental protection, or public safety conditions on wireless facilities projects