



Via Electronic Mail

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RE: Joint Advisory Committee on Communications Capabilities of Emergency Medical and Public Health Care Facilities

Dear Committee Members:

PCIA/The Wireless Infrastructure Association is writing to provide input towards the Committee's report to Congress that will ensure reliable communications capabilities for emergency medical and public health care facilities. As discussed in more detail below, PCIA urges the Committee to recommend policies that will ensure broad, technology neutral network deployment for the benefit of emergency medical and public health users.

PCIA is the national trade association representing the wireless infrastructure industry. PCIA's members develop, own, manage, and operate towers, rooftop wireless sites, and other facilities for the provision of all types of wireless, broadcasting and telecommunications services. With a mandate to facilitate the deployment of wireless infrastructure, PCIA and its members have partnered with communities across the nation to effect solutions for wireless infrastructure deployment that are responsive to the unique sensitivities and concerns of these communities. PCIA's members actively support the development of a robust wireless infrastructure for health care providers and first responders as a critical component of public safety and homeland security. Our members have significant business ties with these communities wherever they do business.

We believe that a variety of communications technologies, including wireline, wireless, WiMax and broadband services, will provide the optimal communications system to health care providers and first responders, as well as to the community at large. A "tech-neutral" approach is more likely to increase the long-term viability of the communications system developed as a



result of the Committee's efforts. Crucially, the solution must include wireless technology. Approximately 85% of the U.S. population owns at least one wireless communications device; thus, wireless clearly is a cornerstone of our communications system. PCIA's members' tower infrastructure allows wireless providers of all types to continue to develop their already-robust wireless networks to meet the public's growing needs.

Wireless infrastructure plays a crucial role in current public health and emergency communications capabilities and is an essential component in the evolution of communications solutions for these providers. The broad, public availability of wireless services has resulted in the most significant improvement in public safety and delivery of emergency medical care in the last several decades. At the same time, the availability of wireless infrastructure benefits particularized users such as health care providers and first responders at the same time as it benefits the public at large. The broadening demand for wireless services has resulted, however, in spiraling demands for wireless infrastructure. As wireless users "cut the cord" and use wireless devices as their sole means of communication, in-building coverage and coverage in residential areas becomes essential. As the types of wireless usage increase to include not only voice service, but data, locational, and media service, network operators must increase capacity to handle the traffic demands of those networks. Moreover, there has been a concurrent regulatory emphasis on deployment at all levels. This can be seen in recent Congressional and FCC initiatives towards broadband mapping, and the aggressive deployment requirements for spectrum to be awarded in the upcoming 700 MHz auctions. Thus, the Committee's recommendations should encourage broader and more reliable wireless infrastructure deployment.

The Committee can do this by focusing its recommendations in two areas. First, the Committee should recommend legal and regulatory changes that facilitate the siting of communications towers and antennas. While some municipal authorities recognize the importance of wireless infrastructure development and work productively to permit the deployment of needed towers and antennas, others unfortunately interpose needless and burdensome obstacles to siting facilities – some of which are blatantly illegal, such as presumptions of denial and restrictions related to radio frequency radiation that is consistent with FCC standards. Congress and other federal authorities can help remove these barriers to wireless infrastructure deployment by establishing more consistent standards for tower siting decisions. While a single federal standard would be most beneficial, even uniform standards within each state would be an enormous step forward.

Second, the Committee should recommend that Congress ensure that the investment climate is hospitable to wireless infrastructure development. There is no question that properly targeted government involvement can encourage deployment of crucial infrastructure. For example, the Commission's longstanding universal service programs have resulted in overall telephone penetration rates above 97 percent. More recently, universal service programs have supported the extension of Internet access into virtually 100% of K-12 public and non-profit schools and



begun to stimulate wireless infrastructure deployment in previously unserved areas, such as Tribal Lands. The successes in these programs can serve as a model for future incentives.

PCIA's mission is to educate policy-makers on the role of wireless infrastructure, and to advocate for policies that enable wireless infrastructure to develop. Thus, we appreciate the opportunity to provide comment to this important piece of legislation and are keenly interested in participating in future opportunities to engage this process, should such opportunities emerge.

Thank you for your time and consideration.

Best regards,

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