

**Before the  
National Telecommunications and Information Administration  
Washington, D.C. 20230**

|   |   |                                     |
|---|---|-------------------------------------|
| <b>In the Matter of</b>                           | ) |                                     |
|   | ) |                                     |
| <b>Development of the State and</b>               | ) | <b>Docket No. 120509050-1050-01</b> |
| <b>Local Implementation Grant Program for the</b> | ) |                                     |
| <b>Nationwide Public Safety Broadband Network</b> | ) |                                     |
|   | ) |                                     |

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

**I. Introduction**

PCIA—The Wireless Infrastructure Association (“PCIA”) submits these comments in response to the *Request for Information* (“RFI”) seeking public comment on various issues relating to the development of the State and Local Implementation Grant Program, which NTIA must establish pursuant to the Middle Class Tax Relief and Job Creation Act of 2012 (“the Act”).<sup>1</sup> PCIA supports NTIA’s goal in this proceeding of assisting state and local governments in planning for a single, nationwide interoperable public safety broadband network, and believes that the wireless infrastructure industry, with its knowledge and experience, can play a vital role in providing resources and partnering with communities to aid in the deployment of the public safety network.<sup>2</sup>

PCIA is the national trade association representing the wireless telecommunications infrastructure industry. PCIA’s members own and manage more than 125,000 telecommunications towers and antenna structures upon which cell sites can be collocated. PCIA and its members partner with communities across the nation to effect solutions for wireless

---

<sup>1</sup> Pub. L. No. 112-96, §6409 (2012), *available at* <http://www.gpo.gov/fdsys/pkg/BILLS-112hr3630enr/pdf/BILLS-112hr3630enr.pdf>

<sup>2</sup> Development of the State and Local Implementation Grant Program for the Nationwide Public Safety Broadband Networks, Request for Information, Dept. of Commerce, National Telecommunications Information Administration, 77 Fed. Reg. 91 at 28857-28860 (May 16, 2012) (“RFI”).

infrastructure deployment that are responsive to the unique sensitivities and concerns of each community. PCIA seeks to facilitate the widespread deployment of communications networks across the country, consistent with the mandate of the Telecommunications Act of 1996.<sup>3</sup>

Over years of experience, the wireless infrastructure industry developed the tools, relationships, data, and methods necessary to successfully create an evolving wireless ecosystem. The data compiled by the industry for that purpose is vital to the efforts of the First Responder Network Authority (“FirstNet”) and associated agencies in deploying the public safety network prescribed by the Act. FirstNet and associated agencies should utilize the readily available and free data, compiled by the wireless infrastructure industry for commercial networks, for the purposes of deploying the public safety network. In addition, the industry develops and fosters public/private partnerships in the deployment and management of networks and infrastructure. NTIA should encourage such beneficial relationships in the buildout of the Public Safety Network by making the associated costs an eligible cost under the State and Local Implementation Grant Program. Finally, when establishing clearinghouses for existing infrastructure, states should use tested industry methods and data fields. Together, these efforts will enable communities to develop an organized and cost-effective plan for deploying a public safety broadband network based on the wireless infrastructure industry’s experience and data.

## **II. FirstNet and Associated Agencies Should Leverage Wireless Infrastructure Industry Data on Existing Infrastructure for the Deployment of the Public Safety Network**

As noted in the RFI, the Act prescribed that in constructing a nationwide public safety broadband network, FirstNet should leverage existing commercial infrastructure to the maximum

---

<sup>3</sup> Pub. L. No. 104-104, § 706(a), 110 Stat. 56, 153 (directing the Commission to “encourage the deployment on a reasonable and timely basis of advanced telecommunications capability to all Americans . . . by utilizing, in a manner consistent with the public interest, convenience, and necessity . . . regulating methods that remove barriers to infrastructure investment”) (reproduced in the notes following 47 U.S.C. § 157) (“1996 Act”).

extent economically desirable.<sup>4</sup> With the infrastructure that already supports multiple nationwide and regional networks readily available for use by the public safety network, FirstNet and its associated entities can realize the expedited deployment and cost-savings of collocation over new tower construction. PCIA members estimate that collocation at an existing site can save as much as one year in time and 90% of the cost of a new site.<sup>5</sup>

The wireless infrastructure industry, composed of the carriers, tower companies, and other infrastructure providers, owns, operates and manages over 125,000 wireless facilities. The wireless infrastructure industry is unique because competitive neutral-host providers often own the physical support structure. The nature of the wireless infrastructure market creates a system where a neutral-host provider leases space on its towers to multiple different service providers. Over the last decade, the neutral host infrastructure industry grew into a vital component of the broader wireless infrastructure industry. These infrastructure-centric companies have developed policies and efficiencies that greatly benefited the deployment of 2G, 3G, and now 4G commercial and public safety wireless networks. For example, the detailed databases of existing wireless facilities developed by the infrastructure providers facilitated the deployment of current and next-generation networks. These databases utilize key data sets and mapping techniques to provide an easily accessible overview of wireless infrastructure resources. In fact, databases from individual companies routinely list competitive towers in addition to their own assets, further simplifying the process by aggregating multiple data sources. These databases are publicly

---

<sup>4</sup> RFI at 28858.

<sup>5</sup> See Comments of PCIA—The Wireless Infrastructure Association and The DAS Forum, WT Docket No. 11-186, at 7 (December 5, 2011) (“PCIA 2012 Competition Report Comments”). See also Comments of PCIA—The Wireless Infrastructure Association and The DAS Forum, WC Docket No. 11-59, at 22-26 (filed Jul. 18, 2011) (“PCIA Broadband Acceleration Comments”).

available, but most importantly, they are frequently updated to provide a current view of available siting options.<sup>6</sup>

As NTIA examines the allowable costs under the State and Local Implementation Grant Program for data gathering on current broadband and mobile data infrastructure<sup>7</sup>, the Administration and state and local agencies should actively use readily available and free commercial infrastructure data. In addition to commercial data sources, several federal agencies similarly compile data on existing infrastructure that can be easily utilized without cost. One such example is the Federal Communications Commission's ("FCC") Spectrum Utilization Study Software.<sup>8</sup> In sum, just as the public safety network can leverage the infrastructure that supports current wireless networks, state and local agencies can leverage the information used to plan the buildout of these networks to save costs and speed deployment.

### **III. Wireless Infrastructure Public/Private Partnerships Already Benefit Local Networks and Should Be Encouraged by NTIA**

The RFI seeks comment on planning for the establishment of public/private partnerships in the deployment of public safety network infrastructure. The wireless infrastructure industry forged these partnerships in the past, and PCIA urges NTIA to encourage these beneficial relationships today.

PCIA members currently work with state and local agencies to build and manage wireless infrastructure. Among the state and local agencies with which the industry has established public/private partnerships are the New York State Police the New York Department of

---

<sup>6</sup> For examples of widely available commercial infrastructure databases, *see* <http://www.gtpsites.com>; <http://www.towerco.com>; <http://www.insitewireless.com>; <http://www.americantower.com>; <http://www.centralstatestower.com>; <http://www.atttowers.com>; <http://www.t-mobiletowers.com>; <http://www.crowncastle.com>; <http://www.sbasite.com/>.

<sup>7</sup> RFI at 28858, 28859.

<sup>8</sup> Office of Engineering and Technology, Spectrum Utilization Study Software, *available at* <http://transition.fcc.gov/oet/info/software/suss/>.

Transportation, the Commonwealth of Pennsylvania and the Florida Department of Transportation. These public/private partnerships allow the state agencies to benefit from the efficiencies provided by neutral host providers, including tower development, site management and tower maintenance, as well as asset marketing.

To provide this opportunity to states and localities across the country, the establishment of these public/private partnerships should be an eligible cost under the State and Local Implementation Grant Program. PCIA is uniquely positioned to facilitate this process by serving as a resource for connecting interested agencies with its membership. Furthermore, the experiences of the aforementioned agencies and their private sector partners serve as models for future partnerships.

#### **IV. In Establishing Clearinghouses for Existing Infrastructure, States Should Use Tested Industry Methods and Data Fields**

The RFI seeks comment on logistics involved in states establishing clearinghouses for network resources, including infrastructure.<sup>9</sup> As FirstNet and associated agencies consider utilizing network resources owned and operated by a variety of entities, including state and local public safety agencies and commercial providers, consistency in the data is vital to ensure that the most effective assets are being leveraged. Through years of effective wireless site development and management, the wireless infrastructure industry has developed data sets that provides an accurate assessment of available infrastructure.<sup>10</sup>

To ensure that state and local government infrastructure clearinghouses are consistent and can be readily cross-referenced with commercial data, NTIA should recommend a baseline data set. Among the categories commonly used by the wireless infrastructure industry and

---

<sup>9</sup> RFI at 28859.

<sup>10</sup> *See, e.g., supra* note 6.

fundamental to practical network deployment are: latitudinal and longitudinal coordinates up to one-tenth of a second; ground elevation; height of the structure; structure type; address; and pertinent FCC site identification numbers (if applicable). Again, in this instance, commercial databases can serve as models due to the industry's years of experience and fine-tuning of its methods and data sets.

**V. Conclusion**

For the foregoing reasons, to successfully develop the State and Local Implementation Grant Program and aid communities in the deployment of the public safety network, NTIA should leverage the wireless infrastructure industry's data on existing infrastructure, encourage public/private partnerships, and use tested industry methods and data fields to develop a clearinghouse for existing infrastructure.

Respectfully submitted,

PCIA—THE WIRELESS INFRASTRUCTURE ASSOCIATION

By: \_\_\_\_\_/s/\_\_\_\_\_

Michael T.N. Fitch, Esq.  
*President and CEO*  
Jonathan Campbell  
*Director, Government Affairs*  
D. Zachary Champ  
*Government Affairs Counsel*  
Kara Leibin Azocar  
*Government Affairs Counsel*

901 N. Washington St., Suite 600  
Alexandria, VA 22314

June 15, 2012