



November 21, 2011

**VIA ELECTRONIC MAIL**

Connecticut Siting Council  
Attention: Melanie Bachman, Staff Attorney  
10 Franklin Square  
New Britain, Connecticut 06051  
siting.council@ct.gov

**Re: Connecticut Siting Council Notice to Amend Regulations**

Dear Ms. Bachman,

PCIA—The Wireless Infrastructure Association (“PCIA”) writes in response to the Connecticut Siting Council’s Notice of Intent to Amend Regulations and proposed changes to its regulations that implement current State law regarding the siting of wireless tower facilities.

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, telecommunications and broadcasting services. PCIA and its members partner with communities across the nation to affect solutions for wireless infrastructure deployment that are responsive to the unique sensitivities and concerns of each community.

Wireless services from basic voice communication to broadband require robust wireless infrastructure. These services enable communication, increase productivity and mobility and assist the work of public safety. For example, more than 70% of all emergency calls each day are placed with a wireless device—without wireless infrastructure, the ability to access first responders is significantly hindered. Residents and businesses rely on wireless services to navigate their daily lives and compete in a global economy. It is estimated that by 2015, a majority of Americans will utilize a wireless device as their primary Internet access tool.

As a general matter, good wireless infrastructure laws and regulations do several things, including:

- Facilitate the deployment of the latest technology and advanced services for the benefit of both residents of the territory and any visitors;
- Ensure towers are not placed without proper permitting;
- Ensure towers are placed safely and comply with necessary local and federal requirements;
- Incent joint use of facilities if feasible;
- Minimize to greatest extent possible the cost to place towers;
- Establish reasonable timeframes for all approvals to be given.

PCIA believes that current Connecticut State law generally accomplishes these goals, though changes are warranted in accordance with more recent federal law related to wireless facility siting. For example, State law currently provides for a tower siting application process that well exceeds the FCC’s five month presumptive timeline. Additionally, we note that areas related to network reliability are within the FCC’s exclusive jurisdiction to regulate and fall outside of traditional

areas of State and local jurisdiction over wireless infrastructure. While outside of the Council's jurisdiction, we bring these matters to your attention to the extent the State Legislature considers changes to the statutes that govern the Siting Council as an agency.

With respect to the subject matter of the Council's notice and as with any new regulatory initiative at the State and local level, PCIA evaluates such proposals in context with federal policies and with an overall perspective that regulations on wireless facilities should not place undue burdens or limitations on the deployment of wireless facilities. The Council's proposed regulatory amendments appear to require more notice to the public and, while adding additional procedural burdens on the wireless industry, do not overly regulate the industry in a manner that would be counter to the interest in deployment of wireless services. As such, we encourage the Connecticut Siting Council not to make further changes to the regulations in addition to those already proposed.

In conclusion, while PCIA expresses no specific objection to the Connecticut Siting Council's proposed regulatory amendments, we urge the Council to continue its focus to ensure that the public is adequately served with robust wireless communications with additional tower infrastructure. The wireless services upon which the citizens and businesses of Connecticut rely are themselves reliant upon the responsible deployment of wireless facilities, and the Council need not regulate further to balance industry deployment and the interests of others who participate in Council proceedings.

We appreciate your understanding of the goal to implement and deploy responsible and timely wireless infrastructure to serve the needs of the citizens, businesses, and first responders in Connecticut.

With best regards,



Kara Leibin Azocar  
Policy Analyst  
PCIA—The Wireless Infrastructure Association  
901 N. Washington St., Suite 600  
Alexandria, VA 22314  
703-535-7451  
[Kara.Azocar@pcia.com](mailto:Kara.Azocar@pcia.com)