

TESTIMONY OF GUY GWYNNE

FEDERATION OF CITIZENS ASSOCIATION OF THE DISTRICT OF COLUMBIA

October 17, 2002

Zoning Commission Case No. 01-02:  
(Text Amendment - Regulation of  
Antennas, Antenna Towers and Monopoles)

My name is Guy Gwynne. I am here today representing the Federation of Citizens Associations of the District of Columbia.

First, I want to note that this proposed new amendment for the regulation of the antenna and antenna tower issue represents a major step forward in getting a regulatory grip on the burgeoning antenna and antenna industry in the District. We thank the Commission for the obviously extensive work and thought that has gone into its preparation.

In case there is opposition to it, I want to recommend especially that the provision be retained that all applications for a building permit for an RF or radio frequency emitting antenna be accompanied by a certification from a licensed engineer that the antenna will comply with the Federal Communications Commission's radiation guidelines and OSHA regulations. This certification should specifically include information on the RF radiation to be generated by the antenna and the cumulative RF radiation generated by all other antennas at the proposed site and within 200 feet. This very important provision will allow the District to have the information with which it can begin to monitor and enforce radiation levels.

And, for neighborhood as well as commercial area purposes, new section 2614 that requires owners, at their own expense, to remove any antenna, antenna tower, monopole or equipment cabinet that has not been used for a year is a good provision, and provides a welcome element of future order.

On the other hand, we urge that Section 2607 on antenna additions to existing antenna towers and monopoles should be revised by adding the following conditions:

- a. that the application must include information on maximum capacity of the tower or monopole, including the number of each generic type of antenna it will hold and the estimated maximum RF radiation emissions from the tower when filled to capacity;
- b. that any antenna added to an existing tower must not increase the cumulative RF radiation emissions from the tower above the FCC guidelines;
- c. that any antenna added to an existing tower in those districts where new towers would be prohibited (R and C-1) districts or, if any are allowed, only by special exception in those districts.

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**EXHIBIT NO. 108**

Finally, in the matter of rented space for so-called "stealth" structures (section 2606.1) (alt.), this section would allow very few controls on these structures, or the type or size of antenna put in or on them, and no public notice or process. More advisable would seem to be to make the provisions of sections 2603 (ground-mounted antennas, 2604 (roof antennas) and 2605 (building-mounted) apply. As the Office of Planning has noted, (Oct. 3, 2002 Supplemental Report, they have received an indicative "real world" proposal for a second stealth flagpole at St. Johns College High School on Military Road. This could lead to a proliferation of such structures and turn the schoolyard into a tower farm. The principle would apply everywhere.

Once again, we commend the Commission on this new initiative.

FOR THE FEDERATION OF CITIZENS ASSOCIATIONS

A handwritten signature in cursive script, appearing to read "Guy Gwynne".

Guy Gwynne

Member, Board of Directors