

BEFORE THE
DISTRICT OF COLUMBIA ZONING COMMISSION

**Comments Submitted For Roundtable Discussion
Of Issues Affecting Antennas
And Antenna Structures**

**Filed On Behalf Of
AT&T Wireless Services**

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March 5, 2001

Comments of AT&T Wireless Services
District of Columbia Zoning Commission's
Roundtable Discussion of Antenna
Structure Siting Regulations

AT&T Wireless Services is licensed by the Federal Communications Commission to provide personal communications services ("PCS") in the District of Columbia, the greater Washington, D.C. metropolitan area, and in major metropolitan markets throughout the United States. Its ability to provide quality wireless telecommunication services to its subscribers in the District and nationwide is directly dependent on its success in deploying its network infrastructure. That infrastructure consists primarily of strategically placed base stations or antenna sites.

In the vast majority of cases, AT&T's base stations are installed on existing structures such as water tanks, building roof tops and other features in the urban landscape where they go largely unnoticed. A city such as the District of Columbia, with its compact size and dense urbanization offers many opportunities to install base stations where they will have minimal, if any, visual impact on the community. Indeed, that is AT&T's objective whenever it seeks a location for one of its antenna sites. For that reason, we welcome this opportunity to participate in this roundtable discussion with the Zoning Commission as it considers how best to enable those who live, work, visit, or travel through the District to enjoy the convenience and safety afforded by dependable, consistent wireless communications while minimizing the obtrusiveness of the industry's infrastructure.

One can hardly ignore or pretend not to know that the catalyst for the Commission's urgency in focusing on antenna siting has nothing to do with the increasing popularity of personal wireless telecommunications. The controversy flowing from the now-enjoined constructions of an "ultra tall" broadcast tower has, unfortunately, spilled over into the less intensely scrutinized and, we believe, less problematic and more easily manageable challenge of wireless antenna siting.

Historically, the District's municipal regulations have recognized the distinction between commercial broadcast antenna towers (*see* 11 DCMR § 211 (1995)) and antennas other than those used for commercial broadcast (*see* 11 DCMR § 212 (1995)). The intensity of the use, which is a characteristic of large, very tall lattice tower structures associated with broadcast antennas is not, and should not be confused with antennas required to deliver wireless telecommunication services. It is, we believe, inappropriate to even include pole mounted wireless antenna within the definition of "tower." The more modest height and slimmer silhouette presented by most monopoles is sufficient reason not to categorize them as towers, especially when, as here, the Commission is weighing new regulations that will pertain to 500' plus tall broadcast antenna structures. AT&T Wireless does believe that it would be helpful to have the term "monopole" defined in the District's zoning regulations. However, AT&T does not favor its inclusion in any definition of the term "antenna tower." Simply stated, a monopole is not a tower, at least not in the parlance of antenna support structures. Moreover, the siting needs and site characteristics of wireless service providers are far different than those who

require broadcast antenna sites. Regulations intended to manage one are almost certain to unfairly and unnecessarily impinge on the other.

As the Zoning Commission considers how it might update its regulations to accommodate the needs of the wireless industry while preserving the character of the District's communities, we believe that it would do well to focus less on new regulations to restrict monopoles and more on antenna siting policies that encourage greater use of existing structures and roof tops. By facilitating the industry's use of the built environment, it becomes less likely that new freestanding poles will be needed to provide service in the city. To that end, AT&T strongly encourages the Commission to consider modifying the current roof structure limitation that requires that all penthouses and mechanical equipment be confined to a single enclosure. This limitation effectively means that if a wireless carrier cannot locate its equipment within an existing roof top structure, it is barred from installing its antenna on that roof. In AT&T's experience, this limitation has caused it to forego otherwise acceptable and visually unobtrusive antenna installations on building roofs. Roof top equipment enclosures can be designed to be architecturally consistent with whatever penthouse or mechanical equipment enclosure might be in place, and a relaxation of this restriction would substantially increase the number of alternate sites that AT&T and other wireless carriers would have available to them.

Whatever course the Commission takes in this effort to regulate antenna sites in the District, AT&T urges that it act deliberately and with an appreciation of the fact that broadcast towers and wireless antenna supports, be they roof top installations or monopoles, are dramatically different in their aesthetic impacts. This roundtable is a laudable first step in gaining an understanding of the wireless industry's siting needs and concerns. We trust that it is the beginning of a continuing dialogue with the industry that will result in antenna siting regulations that encourage and reward responsible facilities siting practices.