

The Greater
Washington



**Board
of Trade**

A Regional Chamber of Commerce
for the District of Columbia, Northern Virginia and Suburban Maryland

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Robert A. Peck, President

October 16, 2002

Carol Mitten, Chair
D.C. Zoning Commission
441 4th Street, NW
Suite 210 South
Washington, DC 20001

Re: Proposed zoning text amendment regarding Antennas, Antenna
Towers and Monopoles
Zoning Commission Case No.: 01-02

Dear Chairman Mitten:

On behalf of members of The Greater Washington Board of Trade I want to express my concern about certain aspects of the proposed text amendment regarding Antennas, Antenna Towers and Monopoles. We understand that the Zoning Commission will have a hearing on this matter on October 17, 2002 and at that time, will consider proposals suggested by the Office of Planning.

Our understanding is that these amendments were initiated after construction on the *broadcast tower* in Tenleytown was started and then halted because of litigation. This tower, proposed to be some 700 feet in height, is entirely unrelated to deployment of wireless networks. It is also our understanding that the vast majority of antenna installations for the wireless service providers are installed on existing structures, such as buildings, power lines, water tanks, etc. In other words, because of a controversial *broadcast tower*, the more mundane and unobtrusive antenna sites for *non-broadcast* providers (such as cellular and PCS carriers) are being made to pay a high regulatory price.

In its first Report to the Commission, the Office of Planning stated the following:

"the purpose of the regulations is to... [a]ccommodate the growing demand for telecommunications facilities and antennas."

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We are concerned that the proposed text amendments have strayed a good deal from this stated purpose, and that the Zoning Commission may inadvertently create an environment for the wireless industry that will choke development of the networks.

While the Board of Trade recognizes that amendments to the Zoning Regulations are clearly within the purview of the Zoning Commission, we are concerned that the proposed changes will have a serious, adverse affect on District of Columbia residents, businesses and employees who increasingly rely on wireless phones as a tool of everyday life. As we read them, the proposals by the Office of Planning will create significant and unnecessary new hurdles for the deployment and enhancement of wireless services in the city. To erect new hurdles, when it is readily apparent that this technology is an increasingly predominant means of communication for business and for personal and family convenience, is not in the best interests of the greater community.

We are especially alarmed that these recommendations intersect with the District's and the region's capacity to prepare for, respond to, and recover from emergencies. Wireless communications have become vital to public safety in recent years even absent a major emergency. For example, Metropolitan Washington Council of Government's Regional Incident Coordination and Communication System (RICCS) is structured to rely on wireless communications. With a new and more challenging environment following the attacks of September 11, 2001, it is imperative that all networks be functioning at optimum levels.

By inhibiting wireless carriers' ability to provide adequate coverage and capacity, the recommended proposals could have a lasting detrimental impact on the quality of wireless service utilized by the District's residents, businesses, visitors, and emergency service personnel.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Robert A. Peck". The signature is fluid and cursive, with a large initial "R" and a stylized "P".

Robert A. Peck