



May 17, 2018

Mr. Clark Gilman, Chair
Land Use and Environmental Committee
Olympia City Council
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Olympia, WA 98501

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Re: Small Cell Zoning Code Amendments
Agenda Item #6.C – File No. 18-0457

Dear Chair Gilman and Committee Members:

Thank you for providing this opportunity to comment on the Committee's consideration of pursuing amendments to Olympia's zoning ordinance to allow small cell wireless facilities in the rights-of-way. We submit these comments on behalf of AT&T.

AT&T supports Olympia's pursuit of a targeted code change to allow small cell facilities in the rights-of-way, and we look forward to working with staff to develop language to make such installations feasible.

Small cell facilities in Olympia's rights-of-way can help serve the community's ever increasing demands for wireless service. Small cell facilities have minimal visual impact and generally rely on infrastructure (such as utility and light poles) that is already part of the built environment. Due to these significant benefits, other communities have adopted measures to encourage small cell facilities and exempt them from land use review. Appropriate regulations for the City's rights-of-way can similarly guide the installation of small cell facilities and provide corresponding benefits to wireless users in Olympia.

In moving ahead, we ask that you consider that AT&T and other carriers are responding to a significant increase in demand for wireless services. For example:

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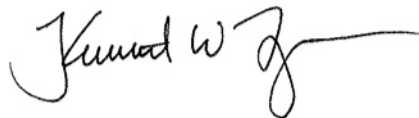
- Since 2007, AT&T has seen data usage on its network increase by 250,000 percent.¹
- Over half (52.5%) of American homes no longer use traditional landline telephone service and instead choose to be wireless only.²
- Nearly three-quarters of American adults aged 25–29 (73.3%) and aged 30-34 (74.4%) live in households with only wireless telephones.³

Furthermore, mobile communications are a critical tool for first responders in emergency situations. According to the Federal Communications Commission, nearly 70 percent of 911 calls are made from wireless phones and that percentage is expected to continue to grow.⁴

To meet the skyrocketing demand in residential areas, better serve businesses, and enhance public safety, carriers need viable options for siting new facilities in a way that will provide meaningful coverage and capacity and high-quality service. Small cell facilities can add much-needed capacity, and in some cases coverage, to targeted areas with minimal impacts to the community.

Thank you for your consideration of these comments. We look forward to working with the City on this matter going forward.

Very truly yours,



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cc: Tim Smith, Principal Planner
Paula Smith, Assistant Planner

¹ http://about.att.com/story/att_details_5g_evolution.html

² CDC Wireless Substitution: Early Release of Estimates from the National Health Interview Survey, January-June 2017 (released December 2017).

³ *Id.*

⁴ FCC 911 Wireless Services Consumer Guide <https://www.fcc.gov/consumers/guides/911-wireless-services>