



August 6, 2018

Mr. Rad Cunningham, Chair
Olympia Planning Commission
601 4th Avenue E.
Olympia, WA 98501

SENT VIA EMAIL: jphillip@ci.olympia.wa.us

Re: Small Cell Zoning Code Amendments
File No. 18-0713

Dear Chair Cunningham and Commissioners:

Thank you for providing this opportunity to comment on the code amendments proposed to allow small cell wireless facilities in the rights-of-way in the City of Olympia (the "City"). We submit these comments on behalf of AT&T.

AT&T supports the City's pursuit of a targeted code change to allow small cell facilities in the rights-of-way. As explained by staff, the current code limits wireless installations to poles of 50 feet or greater in height. Small cell facilities are typically installed at a lower height (often approximately 35 feet), and the proposed text change will allow flexibility in heights for small cell installations on utility and light poles.

We understand that the City is likely to pursue a more comprehensive wireless code change soon, and AT&T looks forward to participating in this broader review and update. In the meantime, the change before you now will remove a barrier to installing small cell facilities in the City.

Small cell facilities in City'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.

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

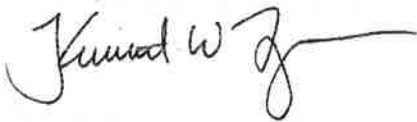
- Since 2007, AT&T has seen data usage on its network increase by 250,000 percent.¹
- Over half (53.9%) of American homes no longer use traditional landline telephone service and instead choose to be wireless only.²
- Nearly three-quarters of American adults aged 25–29 (75.6%) and aged 30–34 (73.3%) 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. My colleague Gregg Busch will be attending your hearing Monday night to provide comments and answer any questions you may have.

Very truly yours,



Ken Lyons

206.227.0020

ken.lyons@wirelesspolicy.com

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, July–December 2017 (released June 2018).

³ *Id.*

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