



May 15, 2006

Federal Communications Commission
Attn: Lisa M. Fowlkes
Enforcement Bureau, 7-C737
445 12th Street, SW
Washington, DC 20554

**Re: Comments to the FCC Independent Panel Reviewing the Impact of
Hurricane Katrina on Communications Networks.**

Dear Ms. Fowlkes:

On behalf of PCIA – The Wireless Infrastructure Association and its member companies, I would like to submit the following comments regarding the impact of Hurricane Katrina on communication towers in the southeastern and gulf coast areas of the United States.

PCIA is the trade association representing the wireless telecommunications infrastructure industry. PCIA's members own and manage more than 50,000 telecommunications towers and antenna facilities that support wireless services across the country. As the representative of wireless infrastructure providers, PCIA endeavors to enable the deployment of widespread dependable communications networks across the country.

PCIA commends the Federal Communications Commission ("Commission") for establishing the Hurricane Katrina Panel ("Panel") and all those who have contributed to its important work. Hurricane Katrina had a devastating impact on the Southeastern United States. It demonstrated once again the critical nature of communications in times of emergency, and it is encouraging to see the Commission carefully consider its impact and potential improvements for the future.

PCIA's Technology Committee, composed of experts from member companies, conducted its own review of the impact of Hurricane Katrina and ways to improve disaster recovery efforts and planning. The Committee reports that of all the towers in the path of the 2005 hurricanes in the southeastern and gulf coast areas of the United States, less than 1% suffered any structural damage, a very low damage rate in light of the extraordinary level of destructive force involved. These results indicate the high degree of safety margin included in site design and construction.

However, PCIA's member companies still find challenges in providing sustainable sites in the event of a natural disaster. These challenges come from restrictive regulations at the local level, such as limitations on back-up power capacity. The inability of a tower

company to provide long-term back up power due to restrictive local regulations prevents sites from continuing to operate in a post disaster situation. Early reports from the Panel recommend more comprehensive and quicker coordination between federal and local officials regarding emergency repair of or creation of temporary replacement infrastructure for wireless communications in the event of a natural disaster.¹ As indicated above, it is not just about coordinating communications between federal and local officials but also about a better balance in non-federal regulations.

PCIA urges the Panel to encourage local and state governments in implementing their wireless infrastructure siting regulations to consider the critical role this capability plays in emergency situations and disaster recovery. Delay and undue regulatory burdens on the creation of communications sites can adversely impact public safety efforts and the public in the case of a natural disaster such as Hurricane Katrina.

As we approach the next hurricane season, PCIA appreciates the Panel's timeliness in making recommendations that can improve the situation for the future. While no one can undo the damage already done, there is great opportunity to avoid or mitigate the damages from future crises. Our members will be active participants in those efforts.

Sincerely,

/s/

Michael T. Fitch

President & CEO
PCIA – The Wireless Infrastructure Association
500 Montgomery Street
Suite 700
Alexandria, VA 22314

CC: Nancy Victory

¹ Adrienne Kroepsch & Howard Buskirk, *Katrina Panel Poised to Report to FCC*, Comm. Daily, May 15, 2006, at 3. [not sure what this adds]