



Additional Questions for the Record:

The Honorable Russ Fulcher

1. When deploying on previously disturbed federal lands, do providers still need to submit environmental and historic preservation reviews?

While the Council on Environmental Quality (CEQ) generally sets policy for environmental and historic review, each federal approval agency is charged with implementing its own rules for these reviews. This has led to a variety of implementations, some of which are more efficiently organized than others. However, there is currently no uniform federal rule that exempts telecommunications deployments on previously disturbed federal lands from requirements for environmental and historic preservation reviews.

2. Can you expound on your comment that requiring an additional NEPA process undermines the idea that permitting processes should be "predictable, proportionate, and timely?" How does this harm both state and local governments and / or local broadband providers that play such a critical role in my state?

Generally, the initial NEPA reviews that are required for construction of the underlying wireless infrastructure are comprehensive and consider a wide breadth of potential impact that infrastructure could have on the surrounding environment. However, redundancies in our current rules—including different processes required by the federal land management authority and the FCC—can often require that same infrastructure to be reviewed again, even when the proposed action would not substantially change the nature of the infrastructure. Operators may need to make minor changes to their deployments based on a variety of reasons such as upgrading radio components, adding or modifying which bands the deployment utilizes, or adding additional capacity. These modifications can have a significant impact on the quality and availability of service without presenting significant new impacts on the environment. WIA supports the bills under consideration that would reduce duplicative reviews in the NEPA process to add predictability and proportionality to the process.

3. Do you agree with the Biden administration and with Republicans on this Committee that we should streamline the environmental review process in these previously disturbed areas, and if so, why?

WIA agrees with the bipartisan consensus that action must be taken to streamline reviews for telecommunications infrastructure to achieve universal service. Recognizing the redundancy of having previously reviewed and distributed locations reviewed again before modifications can be made is a solid step in the right direction towards achieving these goals. Guidance that the federal landowner will be the default lead agency for environmental review would be helpful.



4. With respect to the National Historic Preservation Act review exemption, can you provide any insights on the care used and maintained when locating broadband infrastructure near historic sites? (Please Note: If this is something about which you have experience.)

WIA's members work closely with permitting authorities to plan and implement deployments that are minimally impactful to the surrounding areas while supporting the world class mobile services Americans expect everywhere. One major tool in that arsenal is colocating new equipment on existing structures. Deploying telecommunications infrastructure on existing structures has allowed providers to reduce costs while maintaining the nature and aesthetics of the surrounding area. Colocation is also supported across various federal agencies, including the FCC and the FirstNet Authorizing Statute.

Members report that exemptions apply to colocation project scopes that are inherently minimally impactful. Colocating standard antennas on an existing tower, with base station equipment placed within the existing compound does not substantially alter the visual profile or environmental impacts of the facility. Any substantial increase to the tower height or tower footprint requires further NHPA review. If there is potential for direct or indirect effects on historic or cultural resources, design mitigations can be employed for the life of the facility (e.g., limiting height, painting a certain color, camouflaging as another type of structure, etc.).