



October 17, 2017

Mr. Ajit Pai
Chairman, Federal Communications Commission
445 12th Street, SW
Washington, DC 20510

Dear Chairman Pai:

On behalf of the nonpartisan organizations of the nation's city and county elected officials, we write to urge you to work more closely with local governments to enhance broadband access and accelerate broadband infrastructure deployment.

In particular, we write to urge you and the agency to more fully consider local perspectives in two Notices of Proposed Rulemaking/Notices of Inquiry titled "Accelerating Wireline/Wireless Broadband Deployment by Removing Barriers to Infrastructure Investment" (WT Docket Nos. 17-79 and WC Docket No. 17-84). We also request you provide for an appropriate level of local government representation on the Broadband Deployment Advisory Committee (BDAC), if this body is to be continued, so that local governments can have more input into both the BDAC's and the Commission's deliberations on matters such as these two rulemakings and other proceedings related to broadband deployment in the future.

Specifically, we write at this time to request that going forward the Commission:

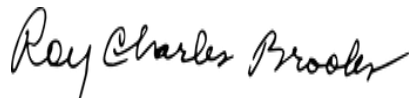
- Protect local authority over rights-of-way, honor our Constitutionally guaranteed protection of fair compensation on the use of public assets, and maintain our Congressionally recognized right to govern the siting of cell towers and small cells in our communities; and
- Address the perception that BDAC is solely interested in pursuing industry goals by making all meetings public, and sharing drafts of all BDAC working documents on the FCC's homepage – in so doing, the Commission and the BDAC would be the beneficiaries of input from a broader group of stakeholders;
- Enhance the scope of the BDAC's mission to consider the broadband industry's responsibility for the broader deployment of wired and wireless broadband services while increasing network quality and lowering the costs to all Americans, including those in rural and low-income areas – today, the BDAC focuses solely on city and state regulations and matters such as pole attachments, missing many other obstacles to broadband deployment, such as broadband industry provider practices and market structure; and
- Provide sufficient time for the BDAC to develop informed opinions that can be shared in interim final reports that are made subject to public review, and guarantee that there is an extended public comment period on materials offered by the BDAC before finalizing any BDAC reports and before the Commission takes any final action in Docket Nos. 17-79 and 17-84.

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By making these changes, the work of the BDAC will be more transparent, data-driven, balanced, forward-looking, and fair. Moreover, because universal access to affordable broadband is so important to our constituents, local elected officials would welcome a BDAC report that outlines the identification of shared challenges and suggested responses for issues such as network-level deployment, design standards, and batch permit processing. We also believe the BDAC would serve the nation well by documenting the need for targeted federal subsidies for building out low-density areas and offering federal grant programs and other resources that allow local governments to replicate successful approaches in other jurisdictions.

Local governments and their elected leaders share your goal of promoting broadband deployment and enhancing access to affordable broadband services. We urge you to work collaboratively and fairly with us in achieving this shared goal.

Respectfully submitted,



Hon. Roy Charles Brooks
President
National Association of Counties
Commissioner
Tarrant County, Texas



Hon. Matt Zone
President
National League of Cities
Councilmember
Cleveland, Ohio



Hon. Mitch Landrieu
President
The U.S. Conference of Mayors
Mayor
New Orleans, Louisiana

CC Commissioner Brendan Carr
 Commissioner Mignon Clyburn
 Commissioner Michael O’Rielly
 Commissioner Jessica Rosenworcel