



420 10th Street, SE Washington, DC 20003

October 5, 2018

Public Space Committee email: PublicSpace.Committee@dc.gov
c/o DDOT Public Space Permit Office, 1100 4th St SW, Room 360
Washington DC, 20024
Att: Small cell

October 5, 2018

Subject: Small cell technology on Capitol Hill

Dear Mr. Marcou:

The Capitol Hill Restoration Society (CHRS), is the oldest and largest civic organization on Capitol Hill and one of the largest in the city. CHRS is committed to preserving the historic fabric and character of Capitol Hill and protecting its neighborhoods, streets, environment, and viewsheds,

Small cell technology is needed to provide wireless service (including future 5G service) in high-density, high-demand areas, complementing cell towers. Each small cell unit is comprised of an antenna and equipment. Wireless carriers have stated at public meetings that they plan to install 2,500 to 2,700 units throughout the city, raising major issues on clutter, all neighborhoods and historic districts, and street trees.

The FCC has determined that it is essential to prepare for 5G technology and has preempted local jurisdictions from prohibiting the installation of 5G technology. The four major cell phone carriers in our area plan to offer 5G mobile cell service in the first half of 2019. Even after 5G is more widely available, many devices will still rely on 4G for roaming outside of 5G coverage areas. Research firm Strategy Analytics projects that by 2023, only 6.5% of global wireless subscriptions will be 5G, while 70% will be 4G.

5G uses ultra-high-frequency airwaves. These signals are fragile, traveling comparatively small distances and easily blocked by buildings and other objects, requiring line-of-sight

transmission and reception. Each cell unit has three parts, receiving and transmitting antennae (mounted on a pole), and electronic equipment. The four major carriers in DC have taken the position that they need their own cell installations because of differences in their equipment that might interfere - that would likely mean four or more 31-foot high poles with attached equipment in every city block.

The FCC regulations allow DC to impose design guidelines. DDOT has issued design guidelines that would allow placing the equipment on cobra-neck street light poles (but not on Washington Globe light poles), wooden telephone poles or new, stand-alone poles located on streets and named alleys. DDOT has already signed master license agreements with the four carriers, and while 5G is not ready, the licenses would allow the carriers to put the new poles in now with 4G cells and add 5G cells to the poles later. The equipment is not small, consisting of fiber cabinets, electrical boxes, amplifiers, antennas, and other components (apparently there would be essentially duplicate 4G and 5G equipment). At least one carrier has refused to place the equipment below-grade.

Because thousands of units are expected to be installed in the District, this raises major issues on clutter, and effects on viewsheds, the monumental core, historic districts, and street trees. The Public Space Committee plans a hearing on October 15, 2018 to consider small cell installations. We urge that that the October 15 deadline be extended so that everyone can have a more transparent and deliberative approach to the issues.

Thank you for considering our comments

Sincerely,

Elizabeth Nelson

Elizabeth Nelson, President

cc:

Hon. Charles Allen, Ward 6 Councilmember callen@dccouncil.us