

December 4, 2017

Peter Murphy, Chairman
Fairfax County Planning Commission
12000 Government Center Parkway
Suite 330
Fairfax, VA 22035

Re: Planning Commission Telecommunications Task Force

Dear Chairman Murphy:

Crown Castle ("Crown") is a telecommunications company that installs and owns wireless communications systems in Fairfax County. Thank you for the opportunity to suggest amendments to the Fairfax County Zoning ordinance being considered by the Planning Commission.

Following amendments to the Virginia Code by the Virginia General Assembly in 2017, Fairfax County amended its Zoning Ordinance, by adding Section 2-519 concerning small cell installations. However, this amendment was done rather hastily in reaction to the General Assembly's enactment. On behalf of Crown, we welcome the opportunity to have your Task Force review the changes that were made in 2017 to address practical industry concerns.

The new small cell provisions of Section 2-519, for the most part, are very helpful. The failure to include replacement structures as a by-right existing location is problematic. It is still not an additional structure - only reinforcement of an existing one. Replacements are allowed under Section 2-514 for utility poles and other existing public and quasi-public poles in the right-of-way for macro-cells. There is no reason to treat small cell replacement poles differently. This discourages, by substantially increasing the cost of deployment, a preferred deployment by increasing the costs and risk of moving forward with certain designs, thereby hindering the installation in important areas of the County where enhanced telecommunications capabilities are important for economic development.

The size constraints for micro-wireless facilities should be reconsidered. The current ordinance is overly restrictive and is inconsistent with the size of micro-wireless equipment that is currently available for deploying in a network. Specifically, Article 7.2 of the Virginia Code, Zoning for Wireless Communications Infrastructure states:

"Micro-wireless facility" means a small cell facility that is not larger in dimension than 24 inches in length, 14 inches in width, and 12 inches in height and that has an exterior antenna, if any, not longer than 11 inches.

We recommend that the Task Force revisit and adopt an industry standard for "micro-wireless facility" that is more consistent with such equipment that is available today. For example, an overall increase in length to 40 inches would increase the currently-available micro-wireless equipment that could be more efficiently deployed under Section 2-519.

Crown looks forward to working with your Task Force on reviewing the above and any other items which may be necessary to address deployment of small cell wireless telecommunications which is rapidly evolving, and which the County desires to maintain a competitive economic development atmosphere.

Respectfully submitted,



Carly T. Didden
Government Relations Manager, Crown Castle