



**STATEMENT OF**  
**PCIA—The Wireless Infrastructure Association**  
**Before the Energy and Technology Committee**  
***Regarding Raised Bill No. 5544***  
***An Act Concerning Storm Preparation and Emergency Response***  
**March 20, 2012**

PCIA—The Wireless Infrastructure Association (“PCIA”) is pleased to submit written testimony regarding Raised House Bill No. 5544 (“HB 5544”). We thank the Committee for the opportunity to provide comment and input. We respectfully ask that you consider the burdens and limitations HB 5544 will place on the deployment of wireless facilities in Connecticut if enacted.

PCIA is the national trade association representing the wireless infrastructure industry. PCIA’s members develop, own, manage, and operate towers, rooftop wireless sites, and other facilities for the provision of wireless telecommunication services. PCIA and its members partner with communities across the nation to affect solutions for wireless infrastructure deployment that are responsive to the unique sensitivities and concerns of each community.

PCIA shares the State of Connecticut’s goal of promoting robust and reliable wireless networks and are in favor of sound policies that facilitate that goal. However, carriers and infrastructure providers—those who plan, build, and maintain wireless networks—are already incentivized to preserve continuity of service. Due to consumer choice and market forces, carriers already create and implement service continuity plans by determining which sites could provide the most effective service in the event of a power outage and can be efficiently equipped with backup power. Carriers are in the best position to make such determinations.<sup>1</sup>

The wireless infrastructure solutions that provide wireless voice service coverage to 99.8% of Americans, and that will provide next generation broadband services, are diverse in both form and deployment. Diversity is necessary in order to address the distinctive needs across the network and across the nation. Originally, many towers were built by carriers to accommodate only their own equipment. But with the inception of neutral host providers and the independent wireless infrastructure industry, these legacy sites now host several service providers and their equipment within the existing compounds. Rooftop sites are commonly used in congested areas or in lieu of towers. Distributed Antenna Systems (“DAS”) “provides its service via a network architecture that uses fiber-optic cable [from a central hub to] small antennas [or nodes] mounted in the public rights-of-way on infrastructure such as lamp posts and utility poles to provide

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<sup>1</sup> Comments of PCIA – The Wireless Infrastructure Association and The DAS Forum, PS Docket Nos. 11-60, 10-92, EB Docket No. 06-119 (filed July 7, 2011); Reply Comments of PCIA – The Wireless Infrastructure Association and The DAS Forum, PS Docket Nos. 11-60, 10-92, EB Docket No. 06-119 (filed Sept. 1, 2011)(“PCIA Comments and Reply Comments”).

telecommunications services to wireless providers.” DAS by design is used in areas where a macro site may not be feasible to provide needed coverage and capacity.<sup>2</sup>

Every wireless facility in a network need not be equipped with backup power in order to maintain service during power outages. Nationwide wireless networks are designed with redundancies to ensure maximum coverage in emergency situations. With each unique infrastructure solution – be it a new tower, collocation on an existing site or building, or DAS – comes unique considerations for the use of backup power. The use of backup power can drastically change the availability of sites for new facilities and opportunities for collocation on existing facilities based on environmental, zoning and other regulatory regimes. Therefore, regulations should not mandate backup power on all facilities and must be compatible with the very diverse infrastructure and cell site solutions that carriers rely upon to provide effective coverage and capacity in a variety of challenging local environments.

No regulatory regime can account for the rapid pace of technological advancements or the diversity of wireless infrastructure solutions utilized in wireless networks. Those who design, install and maintain the networks are better equipped to efficiently channel finite resources into increasing resiliency. The State should allow the architects of wireless networks to use their expertise to ensure resilient networks and continuity of service, as they already do so.

The Federal Communications Commission (“FCC”) is currently investigating a national regulatory regime for backup power on wireless facilities.<sup>3</sup> Although wireless facilities are located within a state’s boundaries, service areas and reliability concerns transcend state lines. Therefore, the federal government stands in the best position to regulate the reliability of such networks. Federal regulation would prevent a costly patchwork of backup power requirements state-by-state that would inhibit, rather than facilitate, the reliability of wireless networks.

PCIA urges you to continue to work proactively to ensure that the citizens, businesses and first responders of Connecticut have access to the wireless services they demand and rely upon. Thank you for the opportunity to offer our comments.

With best regards,



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<sup>2</sup> Request for Partial Stay of NextG Networks, Inc., EB Docket No. 06-119, WC Docket No. 06-63 at 2 (filed Jul. 31, 2007) (“NextG Request”).

<sup>3</sup> Reliability and Continuity of Communications Networks, Including Broadband Technologies, PS Docket Nos. 11-60, 10-92, EB Docket No. 06-119, Notice of Inquiry, 26 FCC Rcd 5614 (2011). *See also* PCIA Comments and Reply Comments.