Before the
ADVISORY COUNCIL ON HISTORIC PRESERVATION
Washington, D.C. 20004

DRAFT PROGRAM COMMENT FOR	**)**
TELECOMMUNICATIONS PROJECTS	**)**
ON FEDERAL PROPERTY	**)**

COMMENTS OF CTIA

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CTIA[1] respectfully submits these Comments in response to the Draft Program Comment for Telecommunications Projects on Federal Property.[2] CTIA appreciates the work undertaken by the federal land managing agencies ("LMAs") and property managing agencies ("PMAs") over the last year in identifying efficiencies for the siting of infrastructure on federal lands and properties. CTIA urges the Advisory Council on Historic Preservation ("ACHP") to adopt many of the proposals in the Draft Program Comment, amended as described below, in order to help ensure that the infrastructure needed to support wireless connectivity can be rapidly deployed while also protecting religious, historic, and cultural areas.

I. INTRODUCTION AND SUMMARY.

The United States leads the world in the deployment and adoption of 4G wireless services. The next generation of wireless services, 5G, holds the promise of unlocking even greater benefits to consumers, government agencies, businesses, and the U.S. economy by

[1] CTIA – The Wireless Association® ("CTIA") (www.ctia.org) represents the U.S. wireless communications industry and the companies throughout the mobile ecosystem that enable Americans to lead a 21st century connected life. The association's members include wireless carriers, device manufacturers, suppliers as well as apps and content companies. CTIA vigorously advocates at all levels of government for policies that foster continued wireless innovation and investment. The association also coordinates the industry's voluntary best practices, hosts educational events that promote the wireless industry and co-produces the industry's leading wireless tradeshow. CTIA was founded in 1984 and is based in Washington, D.C.

[2] *See* Draft Program Comment for Telecommunications Projects on Federal Property (Jan. 13, 2017) ("Program Comment").

providing much faster speeds and enough bandwidth to support the Internet of Things. But the burgeoning demand for 4G and soon 5G mobile broadband is placing tremendous demands on wireless providers, which must not only add spectrum capacity but must also expand the physical networks needed to accommodate that demand. Dense network configurations, comprised of hundreds of thousands of small cells and other facilities, are needed nationwide.

CTIA commends the ACHP, the Department of Homeland Security, and all other participating federal agencies for developing the Program Comment.[3] It is an important step forward that will streamline and expedite wireless broadband deployment on federal properties nationwide. At the same time, it will fully protect historic sites and areas consistent with agencies' obligations under the National Historic Preservation Act. CTIA therefore supports the various proposals contained in the draft Program Comment that will facilitate the rapid and efficient deployment of wireless infrastructure on federal properties and lands. In particular, CTIA supports the straightforward exclusions, which should make their application easier to understand; the inclusion of poles owned by municipalities and co-operatives, which are critical assets; and the inclusion of collocations on buildings and structures that do not otherwise already have an existing antenna.

In order to maximize its effectiveness in streamlining infrastructure deployment while meeting historic preservation objectives, however, CTIA recommends several changes to the draft Program Comment. As discussed below, the ACHP should:

- Extend the Program Comment to apply to all federal lands and federal properties, and encourage other agencies to become parties to or adopt the Program Comment;

[3] As noted in the draft, the Program Comment will initially apply to deployments "that are carried out, permitted, licensed, funded, owned or otherwise assisted by" the Department of Homeland Security, Department of Agriculture, U.S. Forest Service, Rural Utilities Service, Department of the Interior, Bureau of Land Management, Bureau of Indian Affairs, Department of Commerce, and National Park Service. *Id*. at Lines 101-109.

- Clarify that the Section 106 individual site review process will not be required for undertakings that are determined to have no adverse effect under the criteria set forth in the Program Comment;

- Remove or modify various definitions, undefined terms, and other provisions that are unnecessary or create ambiguities as to what actions agencies and applicants need to take; and

- Add exclusions for tower/structure removal and road maintenance projects that will not have an adverse effect on historic properties.

Despite the many substantial benefits that wireless broadband delivers, wireless providers have often faced delays in seeking to deploy network infrastructure on federal lands and properties. Those delays can be substantial, impairing service even when the agencies and their employees would directly benefit from more robust and reliable broadband. The delays are not caused by the effect of new wireless facilities on historic properties; indeed many times, there are no historic properties that are even potentially affected. Instead, the delays often result from different agencies having different procedures for reviewing those facilities, or from lacking clearly defined procedures that provide a roadmap to providers and agencies alike.

As Federal Communications Commission ("FCC") Chairman Ajit Pai stated last year, "[w]ithout a paradigm shift in our nation's approach to wireless siting and broadband deployment, our creaky regulatory approach is going to be the bottleneck that holds American consumers and businesses back."[4] The new Administration also has singled out the importance of massive investments in the nation's infrastructure to adding jobs and strengthening the

[4] Remarks of FCC Commissioner Ajit Pai at the Brandery, *A Digital Empowerment Agenda*, Cincinnati, OH, at 7 (Sept. 13, 2016), https://apps.fcc.gov/edocs_public/attachmatch/DOC-341210A1.pdf.

economy.[5] Wireless networks are an ideal area for that investment because of the tremendous benefits they provide.[6]

New wireless broadband infrastructure to serve federal lands and buildings is particularly essential. Many federal lands are in rural and remote areas that may lack access to high-speed broadband today, but their remoteness makes broadband even more critical to ensure that federal employees who work on these lands, as well as citizens who live on or visit them, have reliable service. Tens of thousands of federal buildings across the nation house large numbers of federal employees whose productivity and performance increasingly require robust broadband services. Ensuring robust services to those locations will benefit federal workers and the public they serve.

By taking the steps described more fully below, the Program Comment can serve as a valuable tool for enabling expeditious wireless broadband deployment in a manner that respects the important preservation goals underlying the Section 106 review process.

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[5] *See, e.g.*, Executive Order Expediting Environmental Reviews and Approvals for High Priority Infrastructure Projects, Executive Order 13766, 82 Fed. Reg. 8657 (Jan. 24, 2017), https://www.gpo.gov/fdsys/pkg/FR-2017-01-30/pdf/2017-02029.pdf ("Infrastructure investment strengthens our economic platform, makes America more competitive, creates millions of jobs, increases wages for American workers, and reduces the costs of goods and services for American families and consumers. Too often, infrastructure projects in the United States have been routinely and excessively delayed by agency processes and procedures. These delays have increased project costs and blocked the American people from the full benefits of increased infrastructure investments, which are important to allowing Americans to compete and win on the world economic stage.").

[6] *See, e.g.*, *Smart Cities: How 5G Can Help Municipalities Become Vibrant Smart Cities*, Accenture Strategy (2017), https://newsroom.accenture.com/content/1101/files/Accenture_5G-Municipalities-Become-Smart-Cities.pdf; *Wireless Connectivity Fuels Industry Growth and Innovation in Energy, Health, Public Safety, and Transportation*, Deloitte (2017), http://www.ctia.org/docs/default-source/default-document-library/deloitte_20170119.pdf.

II. THE PROGRAM COMMENT SHOULD APPLY TO ALL FEDERAL LANDS AND PROPERTIES AND INCLUDE ADDITIONAL FEDERAL AGENCIES.

The benefits of streamlined procedures depend on agencies' ability to apply those procedures to all lands and properties that they manage. Conversely, excluding lands and properties would materially reduce those benefits.

Section II of the Program Comment includes only a subset of the agencies that manage federal lands, and it carves out many federal lands and properties from its reach.[7] These exclusions would undermine the value of the Program Comment in streamlining deployment.

There is no basis to exclude the huge expanse of territory these areas encompass. Many of the excluded areas are in remote parts of the country where high-speed broadband services are currently limited or unavailable. Indeed, some individual National Monuments alone cover thousands of square miles. Similarly, there is no reason to exclude, for example, attaching an antenna to a federal building merely because the building is located in a Military Park. The procedures agencies must follow under the Program Comment will fully protect all historic sites located in these areas. Expanding the scope of the Program Comment to encompass all of these federal lands and properties will clearly serve the public interest. Federal employees who work and live in these areas as well as the public need reliable access to broadband networks. At a minimum, the ACHP should clarify that certain undertakings, such as collocations on and modifications to existing structures located in these areas, are encompassed by the streamlined procedures in the Program Comment. This will enable the Program Comment to achieve its purposes more broadly and effectively.

[7] *See* Program Comment at Lines 117-25 (carving out "National Monuments, National Memorials, National Historical Parks, National Historic Trails, National Historic Sites, National Military Parks, and National Battlefields" from inclusion in the Program Comment).

Moreover, the Program Comment should include additional federal agencies. While the Program Comment includes several agencies that manage certain types of federal lands, and notes that other agencies may join the agreement in the future, many more agencies are not included. Yet all federal agencies own or lease buildings and other structures that provide optimal locations for small cells and other wireless equipment. If the Program Comment does not include more of these agencies, its effectiveness in streamlining the deployment of broadband infrastructure will be curtailed.

ACHP should therefore expand the scope of the Program Comment to encompass all of the federal lands and properties otherwise excluded in Section II, as well as additional federal agencies.

III. THE ACHP SHOULD CLARIFY THAT THE SECTION 106 PROCESS WILL NOT APPLY TO UNDERTAKINGS THAT ARE DETERMINED TO HAVE NO ADVERSE EFFECT UNDER THE PROGRAM COMMENT.

The Program Comment identifies types of undertakings that it determines will not have an adverse effect and thus should be excluded from the site-by-site Section 106 review process altogether. However, the Program Comment seems to contradict itself by appearing to require a review process for projects that it states should be excluded from the review process. These provisions could undermine the benefits of the Program Comment in providing agencies with bright-line rules to determine which projects have no adverse effect and thus do not require further Section 106 review.

For example, Section IV lists the respective "roles and responsibilities" of participating agencies and applicants. Agencies must "consult with the [State Historic Preservation Officer ("SHPO")/Tribal Historic Preservation Officer ("THPO")] to confirm the [Area of Potential Effects ("APE")] for each individual undertaking," make a "reasonable and good faith effort for all proposed undertakings to identify known eligible or listed historic properties within the APE

that may be affected," and study potential adverse effects.[8] These open-ended "roles and responsibilities" appear to apply to all undertakings. However, a key purpose of the Program Comment is to *exclude* certain types of undertakings from the Section 106 process because of the determination that those deployments will not risk adverse effects on historic properties. Section IV should therefore be modified to make clear that the consultation and review roles and responsibilities it lays out do not apply to undertakings that are determined to have no adverse effect under the remaining sections of the Program Comment.

Additionally, most types of undertakings that the Program Comment intends to exempt from Section 106 review would only be "presumptively" determined to have no adverse effect.[9] The Program Comment does not explain why the lack of adverse effect is merely presumed, whether the presumption could be challenged, and, if so, how the presumption could be challenged or rebutted. The use of this term would thus inject unnecessary uncertainty and undermine the goal to expedite deployments that have no adverse effect. Moreover, the concept of a "presumptive" determination has no parallel in the previous Program Comment involving undertakings funded through Broadband Technology Opportunity Program grants or in the Nationwide Programmatic Agreements between the ACHP and the FCC. Accordingly, the term "presumptively" should be removed and the Program Comment should instead mirror Section III of the 2004 Nationwide Programmatic Agreement, which states that undertakings meeting the specified criteria are "excluded from Section 106 review."[10]

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[8] *Id*. at Lines 282-88.

[9] *See, e.g.*, *id*. at Lines 344-45, 420-21, 446-47, 456-57, 475-76.

[10] *See Nationwide Programmatic Agreement Regarding the Section 106 National Historic Preservation Act Review Process*, Report and Order, FCC 04-0222, WT Docket No. 13-128, at Appendix B (2004), https://apps.fcc.gov/edocs_public/attachmatch/FCC-04-222A3.pdf ("2004 NPA").

These modifications are needed to achieve the fundamental purpose of program comments or other program alternatives: to precisely define undertakings that are categorically excluded from Section 106 review so that federal agencies and applicants can minimize the time and resources spent on their reviews, while at the same time fully safeguarding historic sites.

IV. THE ACHP SHOULD STRIKE OR MODIFY A NUMBER OF PROVISIONS IN THE PROGRAM COMMENT TO REMOVE UNCERTAINTY THAT WILL UNDERMINE ITS EFFECTIVENESS.

The Program Comment contains various provisions and terms that are likely to inject uncertainty, and thus delay, into agencies' procedures. By revising or removing these provisions, the ACHP can promote the purpose of the Program Comment and streamline agency review procedures, while continuing to protect historic properties and sites from any adverse effects of new undertakings.

A. The ACHP Should Delete Several Terms and Provisions from the Draft Program Comment.

1. Agency-specific procedures.

Although the Program Comment correctly seeks to implement a single, cross-agency approach to reviewing undertakings on federal lands and properties, a provision in Section II would undercut that unified approach. Section II refers to other LMA/PMA procedures that "may be used as appropriate in place of this Program Comment."[11] This reference contradicts the notion of a unified approach. Moreover, it is unclear when or how agencies would inform applicants that they are subject to one-off procedures, and any such alternative, agency-specific procedures would increase costs and delay. Applicants need clear and known processes to incent deployment. The provision in Section II should therefore be removed.

[11] Program Comment at Lines 114-15.

2. Inadvertent discovery plans.

Section IV.A.6 directs participating federal agencies to "determine the need for, and initiate the development of, a standard inadvertent discovery plan and consult with Consulting Parties, as appropriate."[12] This open-ended provision risks the proliferation of different plans across different agencies and delayed deployments while each agency develops its own plans. The Program Comment should instead contain a single inadvertent discovery plan, which could parallel Section IX of the 2004 Nationwide Programmatic Agreement.

3. Determinations of effect.

Section IV.B.6 requires an applicant to document the recommended determination as to effect on historic properties.[13] This provision should be deleted as ambiguous, as it is unclear what type of documentation is required and what an applicant must do with it. Alternatively, if this provision is intended to encompass the same type of documentation that is required by the 2004 National Programmatic Agreement (*i.e.*, an applicant must retain documentation in its files when an exclusion applies), then the draft should be revised to clearly reflect that obligation.

4. References to "telecommunications."

The Program Comment uses the undefined term "telecommunications" throughout.[14] This term should be deleted as unnecessary. The Program Comment already identifies the types of facilities (*e.g.*, antennas or cable lines) that are covered under its provisions. Moreover, use of the term "telecommunications" to describe some but not all types of facilities could suggest that it is a limiting term, creating uncertainty as to which facilities may be covered.

[12] *Id.* at Lines 315-16.

[13] *See id.* at Lines 346-48.

[14] *See, e.g., id.* at Lines 407, 416, 420.

5. References to known historic properties.

In a number of sections, the Program Comment refers to "known," "previously known," or "previously determined" historic properties.[15] These undefined and ambiguous terms create uncertainty as to how agencies and applicants can identify such properties, and are thus likely to delay approvals of undertakings. They are also unnecessary because Section III specifically defines "historic properties" to include those that are "included in, or determined eligible for inclusion on the National Register maintained by the Secretary of the Interior."[16] That definition, with the clarifications recommended herein, is both appropriate and sufficient. The other terms should therefore be removed.

6. Application notification procedures.

Section IV.B.1 requires an applicant to notify the federal agency of its proposed application "at the earliest possible opportunity in project planning."[17] This provision is overly restrictive and should be revised to read, "at the earliest reasonable opportunity in project planning," as applicants already have sufficient incentive to notify the agency as early as feasible.

7. Notifications of projects outside of, and not immediately adjacent to, historic properties.

Section IV.B.5 of the draft Program Comment requires applicants to "notify the Federal LMA/PMA if the undertaking is *not* located within or immediately adjacent to a known historic property."[18] This provision should be deleted because undertakings that are not within or

[15] *See, e.g.*, *id*. at Lines 286, 340, 350, 371.

[16] *Id*. at Lines 189-91.

[17] *Id*. at Lines 331-32.

[18] *Id*. at Lines 343-44 (emphasis added).

immediately adjacent to historic properties are very unlikely to have adverse effects and notice therefore is not warranted. If the notice requirement is retained, it should be limited to notice of protects that *are* within or immediately adjacent to historic properties. Also, if the provision is retained, the Program Comment should either eliminate or define the phrase "immediately adjacent," which presently is undefined and ambiguous. For instance, the ACHP could define the term "immediately adjacent" consistent with the standard in Section V.A.2 of the Nationwide Programmatic Agreement for the Collocation of Wireless Antennas, *i.e.*, a 250-foot distance if the facility is visible from ground level within the historic district.[19]

B. The ACHP Should Modify Several Provisions and Terms in the Draft Program Comment.

1. Scope of collocations covered.

Section I states that the Program Comment addresses "collocation of antennas on existing *wireless towers*."[20] However, the Program Comment applies to a far broader range of collocations, defining that term as "the mounting or installation of an antenna on an existing tower, building or structure," not merely a wireless tower.[21] This makes sense given that small cells can be installed on a variety of structures, including utility poles, rooftops, and buildings. The ACHP should revise Section I to align it with the actual scope of the Program Comment.

2. Definition of "facility."

Section III defines "facility" as "an improvement or structure, whether existing or planned, that is or would be owned and controlled by the grantee or lease holder *within a [right*

[19] *See First Amendment to Nationwide Programmatic Agreement for the Collocation of Wireless Antennas* (2016), https://apps.fcc.gov/edocs_public/attachmatch/DA-16-900A2.pdf ("Amended Collocation Agreement").

[20] Program Comment at Line 27 (emphasis added).

[21] *Id*. at Lines 152-53.

of way ("ROW")]."[22] The Program Comment does not explain why facilities are limited to those in ROWs, nor is there a basis to do so, particularly in remote areas where coverage and ROWs may be far apart and where providing broadband service may require deployment of facilities located outside of ROWs. In more populated areas as well, there is no reason to restrict the Program Comment's applicability to facilities located in ROWs. Moreover, Section II, which describes the infrastructure deployments the Program Comment covers, does not limit them to ROWs. ACHP should thus revise the definition of "facility" to strike the phrase "within a ROW."

3. Definition of "determined eligible."

Section III correctly defines "historic properties" to include sites that are listed on or "determined eligible" for listing in the National Register,[23] but it does not say how a site is "determined eligible." The Program Comment should be revised to cross-reference the revised definition of "records check" in Section III and amended to specify how that determination is made (*i.e.*, properties formally determined eligible for listing by the Keeper of the National Register). This will clarify the scope of the review for agencies and applicants.

4. Definition of "records check."

The definition in Section III of the "records check" that applicants must conduct to identify potentially affected historic properties[24] is unnecessarily broad and ambiguous, and its application will overburden applicants. It can be tightened while still ensuring that all relevant properties are identified.

[22] *Id.* at Lines 177-78 (emphasis added).

[23] *Id.* at Lines 189-91.

[24] *Id.* at Lines 214-24.

First, the definition of "records check" should be limited to the first three categories listed in the draft Program Comment: (1) properties listed in the National Register; (2) properties formally determined eligible for listing by the Keeper of the National Register; and (3) properties that the SHPO/THPO certifies are in the process of being nominated to the National Register. The two additional categories proposed in the draft, which would sweep in properties covered by a "consensus determination" between the SHPO/THPO and a federal agency, and those that the SHPO/THPO believes meets the National Register criteria (but has not nominated for inclusion), should not be included. There is no basis to require applicants to search for properties that have not been formally designated or certified as eligible for listing in the National Register, and such a requirement would also be unworkably burdensome.

Second, within the three covered categories, applicants should be required to search only electronically available records. In this modern information age with widespread electronic document management, there is no reason to require an antiquated review process that requires a manual search of paper records that may be held by different agencies in different locations.

Third, the proposed definition of "records check" is overbroad because it would require applicants to search a potentially unlimited set of documents including "SHPO/THPO, tribal, and relevant federal agency files, records, and databases or other publicly available sources identified by the SHPO/THPO."[25] Not only is the term "relevant" not defined, but this language fails to specify the records that should be checked, injecting unwarranted uncertainty, delay and cost into the review process.

[25] *Id*. at Lines 215-16.

5. Undertakings in APEs.

Section IV.A.3, addressing federal agencies' roles and responsibilities, contains undefined terms that leave its effect unclear. For one thing, the draft Program Comment exempts undertakings in APEs that have been previously field surveyed in a manner "acceptable to current standards" and found to have no effect.[26] However, APEs are not typically field surveyed and cleared in this way, and the term "current standards" is not defined. Moreover, field surveys are conducted for the direct APE, so the language in Section IV.A.3.i should be revised to address only those field surveys "that resulted in no direct effect."[27] Additionally, the draft Program Comment references previously disturbed APEs where there is a "negligible" or "low probability" of finding historic properties,[28] but these terms are undefined and it is unclear whether they are intended to have different interpretations. The Program Comment should clearly define each of these provisions.

6. Scope of collocation exclusion.

Section VI.C, which addresses collocations of antennas, unnecessarily restricts collocations on non-tower structures more than 45 years old. Specifically, the draft Program Comment states that collocations are determined to have no adverse effect only if the structure "has been previously evaluated and determined not eligible for listing."[29] However, there is no reason to restrict the exclusion to those sites that have been previously reviewed. Instead, the proper question is whether the site is in fact an historic property. Section VI.C should be simplified to state that the collocation exclusion for structures older than 45 years applies to all

[26] *Id*. at Lines 296-99.

[27] *Id.* at Lines 296-97.

[28] *Id*. at Lines 301-06.

[29] *Id*. at Lines 397-404.

structures that are not historic properties (*i.e.*, those that are not listed or determined eligible for listing).

7. Definition of above-ground "connections" and "collocations."

Section VII addresses "telecommunications above-ground connections to and collocations on federal buildings,"[30] but it does not explain what such "connections" and "collocations" include. If they are for antennas used in wireless networks, Section VI already addresses deployment of antennas on non-tower structures, which would include buildings. Moreover, "connections" is not a term typically used to describe wireless facilities. Conversely, if Section VII's purpose is to address *wireline* connections and collocations at federal buildings, Section VII should make this clear.

8. Requirements for tower replacements and new towers.

Sections X and XI, which address tower replacements and new towers, respectively, appear to lay out the same requirements, but describe the requirements differently or contain ambiguous terms.[31] It is unclear whether those differences were intended to impose different procedures and, if so, why different procedures are justified. Indeed, the same procedures should apply to both tower replacements and new towers. Combining Sections X and XI into a single section would clarify and simplify the procedure for review of all towers.

9. Alternative APEs.

Although Sections X and XI provide certain distances for the APE that will expedite the review process, they undercut that certainty by stating, "[t]hese distances are a guideline that can

[30] *Id*. at Lines 407-08.

[31] Compare, for example, Sections X.A., line 542 ("the APE for direct effects") with XI.A, line 583 (the "direct APE"). Likewise, line 549 refers to undertakings that may "diminish or affect the integrity," but does not refer to the integrity of what facility. *Id*. at Lines 542, 549, 583.

be altered based on an otherwise established agreement and on individual circumstances addressed during consultation with the SHPO/THPO and Consulting Parties."[32] By comparison, Section IV.C.5 of the 2004 Nationwide Programmatic Agreement enables the applicant and SHPO to set an alternative APE, but it does not include Consulting Parties. The ACHP should follow the same approach here by removing the reference to Consulting Parties and continuing to allow the SHPO and/or THPO to determine the appropriate APE.

10. Scope of structure or pole replacement exclusion.

Section VIII.B of the Program Comment excludes from review replacement structures or poles that meet certain criteria. One of those criteria is that the height increase associated with the replacement structure/pole is no more than 10 percent the height of the original structure/pole. However, this is only a portion of the height flexibility that has been afforded in previous Nationwide Programmatic Agreements between ACHP and the FCC, which provide that the height increase must not exceed 10 percent, or the height of one additional antenna array with separation from the nearest antenna not to exceed twenty feet, whichever is greater.[33] The Program Comment should include similar flexibility.

V. THE ACHP SHOULD ADD EXCLUSIONS FOR TOWER/STRUCTURE REMOVAL AND ROAD MAINTENACE PROJECTS.

The Program Comment should specifically exclude two additional types of projects: removals of towers or other structures housing wireless facilities, and tower/structure construction that occurs in conjunction with road maintenance projects that do not extend the area of previous ground disturbance. Because these types of actions would not involve any new ground disturbance, and (in the instance of tower/structure removal) involve the removal of a

[32] *Id*. at Lines 565-68, 606-09.

[33] *See* Amended Collocation Agreement at Section E.1; 2004 NPA at Section III.B.

physical structure, they will not adversely affect historic properties and thus should be categorically excluded.

VI. CONCLUSION.

CTIA recommends that ACHP modify the Program Comment as discussed above. Importantly, these changes will fully protect ACHP's statutory objective to protect historic properties. At the same time, the Program Comment, modified as discussed herein, will provide agencies and applicants with a clearer, more precise, and more effective process to help expedite the deployment of wireless infrastructure on federal lands and properties to meet the rapidly growing demand for high-quality wireless broadband.

Respectfully submitted,

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