



Crown Castle
10980 Grantchester Way,
4th Floor
Columbia, MD 21044

September 13, 2022

Gabe Albornoz, President
Montgomery County Council
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

Re: Support – Zoning Text Amendment (ZTA) 22-01

Dear President Albornoz:

Crown Castle is the nation's largest provider of shared wireless infrastructure, we have a long track record of working with the public and municipalities to deploy wireless infrastructure. We deploy co-located small cell facilities, in addition to rooftop antennas, towers and fiber optic cables. Our customers include public and private businesses, governmental entities, healthcare facilities and educational institutions. Our infrastructure helps facilitate working from home, online learning, virtual healthcare and countless other online and virtual services that are needed now more than ever during the ongoing pandemic. We continue to work closely with County officials and other stakeholders to deploy small cells, fiber optic cables and other telecommunications infrastructure to support County residents, visitors, and businesses.

We support the proposed Zoning Text Amendment 22-01 (the ZTA) that paves the way to increased wireless connectivity in the County. Many residents and visitors rely solely on their wireless devices to connect to the Internet. Ubiquitous connectivity like any other utility is a requirement, not a luxury. We use our devices to stay connected from everywhere -- home, work, and in the community.

Crown Castle appreciates the steps taken by the County to support the more efficient deployment of wireless networks. The existing zoning ordinances contain inconsistencies that are addressed by the ZTA. Specifically, if an applicant needs to install their equipment 30 feet from a building, they must install a new pole or a replacement pole because under current guidelines the use of existing poles 30 feet from a building is prohibited. The unintended consequence is that applicants are incentivized to apply for new poles or replacement poles even when there is an existing pole that is capable of hosting the wireless equipment at hand.

Crown Castle constructs wireless networks looking first to collocation opportunities – using existing infrastructure in the right-of-way that can host wireless equipment. The ZTA will allow Crown Castle the opportunity to construction 56 new small cells using existing infrastructure located 30 feet from a building that will not require replacement. This means that wireless broadband service will be improved in 56 areas of the County without putting a shovel in the ground or adding new vertical infrastructure to the right-of-way.

The demand for wireless services from our customers – your constituents – creates a shared responsibility of government and industry to ready the next-generation networks that will serve consumers today and into the future. The small cells enabled by the ZTA will add much-needed capacity to provide the uninterrupted connectivity we all demand today and to prepare for the future. Strong wireless networks enable distance learning for students of all ages; telehealth for patients and health care providers; remote working opportunities; small businesses to thrive in the digital economy; older adults to stay in touch with family and combat social isolation; public safety personnel to utilize the best resources for our safety; and much more. As more County residents rely on these wireless services, the ZTA will allow the wireless industry to explore additional opportunities to deploy wireless infrastructure, resulting in greater investment, increased capacity, and advanced wireless connectivity supporting the needs of businesses and families.

We urge passage of this important ZTA. Thank you for your time and consideration. Please contact the undersigned with questions.

Respectfully submitted,



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Government Affairs

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