

Testimony of
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Regarding
**Zoning Text Amendment (ZTA) 22-01, Antenna on Existing
Structure - Use Standards**

September 13, 2022

I am Rick Meyer and speak this afternoon in opposition to ZTA 22-01 because this ZTA which seeks to accommodate inadequacies and weaknesses of mmWave technology -- is simply no longer needed.

We repeatedly heard demands from two wireless carriers that invested billions in **mmWave** frequency auctions that they **MUST** be granted access to residential rights-of-way to deploy mmWave with very short setbacks.

There have also been implied threats of lawsuits by wireless industry alleging “denial of service” unless essentially unfettered access to residential zones was immediately granted.

Thus, the Council passed ZTA 18-02 in 2018 and opened the barndoor for **access** to more than 33,000 eligible utility and streetlight poles to attach wireless antennas:

- as limited use
- in public rights-of-way
- **inside** residential zones
- so long as the existing pole was 60 feet from nearest dwelling.¹

So, given this urgent industry imperative how many applications from wireless companies have been submitted in the four years since June 2018 for first time antenna collocations **on poles** in residential zones -- according to the Montgomery County Tower Committee database.²

¹ Memorandum to PHED Committee. From: Ndou, Dunn and Rodriguez-Hernandez. **Re: Worksession #3 for ZTA 19-07**. March 5, 2021. Page 3.
https://www.montgomerycountymd.gov/council/Resources/Files/agenda/cm/2021/20210310/20210310_PHED2.pdf

² https://montgomerycountymd.gov/cable/Resources/Files/Towers/databases/MC%20Database%2009_12_22.xlsx

33.³ That's it. 33 in four years with an eligible pool of 33,000 poles.

By contrast, **C-band** technology seems to be rapidly overtaking mmWave particularly in Montgomery County. C-band goes much farther, does a better job of penetrating buildings and foliage and **is cheaper** to roll out.⁴

As proof that mmWave is becoming obsolete, how many applications have been filed since June 2018 in Montgomery County for new and additional antennas **on rooftops, water towers, monopoles, and lattice towers**— where C-Band is typically deployed?

766 applications vs 33.⁵

³ From the current Tower Committee Database as referenced above. Counting applications submitted since June 2018 in residential zones **only**. Does NOT include withdrawn applications.

⁴ Verizon Merges C-Band, mmWave for Faster 5G. Sasha Sagan, PC Magazine. May 5, 2021, <https://www.pcmag.com/news/verizon-merges-c-band-mmwave-for-faster-5g>

⁵ Based on our research the overwhelming number of these Tower Committee applications included installations to upgrade C-Band.

Keep in mind that all three major wireless carriers proudly display coverage maps on their marketing websites showing 4G and 5G wireless coverage is positively glowing in Montgomery County. All three.⁶

Even with 60 ft setbacks.

ZTA 22-01 is simply superfluous and gratuitous.

⁶ <https://www.verizon.com/coverage-map/>
<https://www.t-mobile.com/coverage/coverage-map?INTNAV=tNav:Coverage:5G4GCoverageMap>
<https://www.att.com/maps/wireless-coverage.html>