



September 16, 2025

The Honorable Kate Stewart
Council President, Montgomery County Council
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

**RE: Proposed Zoning Text Amendment (ZTA) 25-11, Temporary Commercial Uses –
Temporary Telecommunications Facility**

Dear President Stewart and Members of the Montgomery County Council:

On behalf of CTIA®, the trade association for the wireless communications industry, I write to express our strong support for the County's proposed Zoning Text Amendment 25-11, which would create a clear category for temporary telecommunications facilities, establishing a predictable process for their approval and use across Montgomery County. We commend the County's efforts to update its regulations to reflect ongoing demand for wireless services.

At present, our members are experiencing unprecedented demand from consumers for more wireless services. In 2024, Americans used more than 132 trillion megabytes of mobile data, shattering the 100T MB mark set just the year before and marking the third straight year of approximately 35% growth.¹ Eighty percent of an estimated 240 million annual 9-1-1 calls are made from wireless devices.² Meeting this demand requires constant investment and commitment to upgrading and deploying wireless infrastructure, whether to support connectivity for local businesses, schools and families or ensuring resilient service, which is especially critical during times of increased network use, such as natural disasters, infrastructure upgrades, or large public events. ZTA 25-11 will help achieve that goal.

Temporary telecommunications facilities can provide extra coverage and boost capacity. The proposed zoning text amendment allows temporary facilities in all zones for up to 180 days, with extensions available for up to two years. The amendment's limits on duration and extension strike a fair balance, ensuring temporary facilities remain responsive to community needs while respecting community standards. This flexibility gives wireless providers the ability to respond quickly to community needs. The facilities are deployed not only during times of emergency response, but also to ensure continuous coverage during scheduled infrastructure upgrades and to meet demand during large public events.

By clearly defining temporary facilities and incorporating them into the zoning code, Montgomery County will reduce uncertainty, promote investment, and better meet growing wireless demand. For these reasons, CTIA urges your support and passage of the County's proposed zoning text amendment.

Sincerely,

¹ <https://www.ctia.org/news/2025-annual-survey-highlights>

² <https://www.ctia.org/the-wireless-industry/infographics-library>



Annissa Reed

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