



Authorized Verizon Wireless Representative

VERIZON WIRELESS 60-DAY ELIGIBLE FACILITY REQUEST
MODIFICATION OF ANTENNAS

Request Date: 11/8/2023

Jurisdiction: City of Puyallup, WA

Departments: Building Division

Site Address: 110 9th Ave. SW Puyallup, WA 98371

Verizon Wireless Contact: Peyton Rena rena.peyton@verizonwireless.com (253)-219-4353

This document serves as Verizon Wireless's eligible facilities request to modify an existing wireless facility on an existing rooftop at the above-referenced site address. This eligible facilities request must be approved administratively under Section 6409 of the Federal Spectrum Act and Federal Communications Commission ("FCC") rules. Review by the City of Puyallup is limited to determining whether the proposed modification qualifies as an eligible facility request that does not substantially change the physical dimensions of the wireless monopole/facility. All permits necessary to commence construction must be approved within 60 days of the request date set forth above, subject to tolling for incompleteness.

For this request, Verizon Wireless attached the following applications for all the permits required by the City of Puyallup to commence construction of this application:

NIER
Structural & Mount Analysis
Building Permit Application
Construction Drawings

PROJECT DESCRIPTION:

The existing wireless facility/equipment (owned by Verizon Wireless) is on an existing/leased building at 110 9th Ave. SW Puyallup, WA 98371. The antennas were constructed and will remain at a height of 23'-6" AGL. There are no changes to the facility in terms of height, width or protrudances. As currently installed, the facility consists of 2 panel antennas and their ancillary equipment such as RRUs and OVPs mounted on the side of the building painted to match the existing color of the building.

To accommodate new wireless technologies, Verizon Wireless proposes to remove (2) RRUs and (1) RRU mount. They also propose to modify (1) antenna mount and install (1) new antenna mount, (2) RRU mounts, (2) panel antennas, and (2) RRUs. There is no site or ground disturbance and no change in height or width of the original facility.



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FCC Rules for Eligible Facilities Request

The Spectrum Act states that “a state or local government may not deny, and shall approve, any eligible facilities request for a modification of an existing wireless tower or base station that does not substantially change the physical dimensions of such tower or base station.” An “EFR” is defined to include any collocation, removal, or replacement of existing equipment.

The FCC adopted rules providing legally binding guidance on key terms of the Spectrum Act, notably defining “substantial change” with the six thresholds described below. The FCC requires that qualifying eligible facilities requests be approved within 60 days, subject to tolling for incompleteness. The 60-day period begins when an applicant takes the first procedural step required by a local government and submits written documentation. The only submittal documents a local government can require are those relevant to determining if a proposed modification qualifies as an eligible facilities request. If a local government does not render a decision within the 60-day period, an EFR can be deemed granted by operation of law.

The Proposed Modification does not Constitute a “Substantial Change:

Below are the FCC’s six “substantial change” thresholds for a wireless tower:

- 1) It increases the height of the structure by more than 10% or more than ten feet whichever is greater:

The height of the structure is not increasing.

- 2) It involves adding an appurtenance to the body of the structure that would protrude from the edge of the structure by more than six feet:

There are no protrusions greater than 6 feet in the new installation.

- 3) For any eligible support structure, it involves the installation of more than the standard number of new equipment cabinets for the technology involved, but not to exceed four.

Or, for towers, it involves installation of any new equipment cabinets on the ground, if there are no pre-existing ground cabinets associated with the structure, or else involves installation of ground cabinets that are more than 10% larger in height or overall volume than any other ground cabinets associated with the structure:

There are no new cabinets being added to the site.

- 4) Entails any excavation or deployment outside the current site (as defined at 47 C.F.R. 1.6100(b)(6)):

There will be no excavation or deployment outside of the current lease area.



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5) Would defeat any concealment elements of the existing facility:

The new equipment will be painted to match the existing color of the building.

6. Does not comply with conditions associated with the prior approval of the existing facility, unless the non-compliance is due only to a change in height, width, etc., that does not exceed the first four thresholds:

None of these conditions will affect the prior approval of the facility, as there is no change in height, width, cabinets, etc.

In sum, the modification clearly qualifies as an “eligible facilities request” under the Spectrum Act and FCC rules, because it does not exceed any of the thresholds such that it would “substantially change” the physical dimensions of the existing tower. Failure to process this EFR and approve all necessary permits within 60 days may result in the request being deemed granted by operation of law.

Thank you for your consideration of this building permit application and proposal for Verizon Wireless. If you have any questions or need additional information, please let me know at 540-784-8927 or email Shinty@lynxconsulting.org.

Sincerely,

Smith Hinty
Lynx Consulting, Inc.
Authorized Agent of Verizon Wireless