



February 3, 2014

Mr. Peter Trachtenberg  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

Dear Mr. Trachtenberg,

The Society for American Archaeology (SAA) is pleased to take this opportunity to comment on the Federal Communications Commission's proposed rule on procedures for the expedition of environmental and historic preservation review of new wireless facilities.

SAA is an international organization that, since its founding in 1934, has been dedicated to the research about and interpretation and protection of the archaeological heritage of the Americas. With more than 7,000 members, SAA represents professional archaeologists in colleges and universities, museums, government agencies, and the private sector. SAA has members in all 50 states as well as many other nations around the world.

Our concerns with the proposed rule focus on the threshold level for review exemptions for modifications of existing facilities, and its applicability to collocation of equipment.

As we understand it, the proposed rule would exempt changes to existing wireless technology structures from reviews under the National Historic Preservation Act and National Environmental Protection Act, should those changes not exceed a 10 percent increase in tower height, along with other related conditions. Certain alterations in structure footprint would also be allowed without a review. In addition, the proposed exemptions would also apply to equipment collocation both inside buildings and attached to their exteriors.

We cannot support the exemption as it is currently written. It is overly broad, and may allow changes that have adverse effects on historic structures or archaeological sites, even if such resources are known to be present in the records of State Historic Preservation Officers, or in an area that is sacred to a tribe. Though the proposed rule seems to consider alterations within the threshold to be de minimis, the experiences of our members who have worked on cell tower installation compliance in the past say otherwise. Most additions resulted in ground disturbance, and even small-scale activities caused alterations to both the ground surface and viewshed.

As such, SAA believes that the FCC should re-work the proposed exemption from NHPA and NEPA review. We encourage the FCC to work with cultural resource professionals and the tribes in crafting a method of ensuring that deployments of new wireless technology are done expeditiously, while still ensuring that such activities receive adequate reviews.

Sincerely,

A handwritten signature in blue ink, reading "Jeffrey H. Altschul". The signature is fluid and cursive, with a large, sweeping flourish at the end.

Jeffrey H. Altschul, Ph.D., RPA  
President