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Honorable Ed P. Reyes
Councilmember
City of Los Angeles
200 N. Spring Street, Room 410
Los Angeles, CA 90012

Dear Councilmember Reyes:

Thank you for meeting with AT&T regarding the proposed revision to the above ground facilities (AGF) ordinance to include wireless facilities on utility poles. The creation of the AGF ordinance was the result of years of time and effort by city staff, community leaders, business organizations, and the telecommunications industry. Over the last ten years, companies such as AT&T have been able to build their networks and serve their customers subject to the regulations of the ordinance. Now that wireless networks have become more ubiquitous, we recognize the need for expanding the AGF ordinance to include the placement of wireless facilities on utility poles. As a follow-up to our discussion, I respectfully urge the Planning and Land Use Management Committee to:

1. Apply the same AGF regulations currently used for monopoles to utility pole installations of wireless facilities. The permit application process for monopoles has been successful since the adoption of the AGF ordinance in 2002.
2. Maintain the AGF exemption for street light pole designs for wireless facilities, which have enjoyed the support of neighborhood organizations, as well as the Bureau of Street Lighting.
3. Remove any language that imposes a time-specific term on AGF permits for wireless facilities. This would add unnecessary uncertainty to the decision to invest in critical wireless infrastructure.

Incorporating proposed wireless facilities on utility poles into the AGF ordinance will subject those facilities to a notification process and possible appeal by property owners to the Board of Public Works. At the same time, notification will allow wireless providers to engage residents, neighborhood councils, and city council staff early in the permit review process.

Best regards,

Anita Q. Gabrielian
Regional Vice President

cc: Councilmember Jose Huizar, Councilmember Mitchell Englander