



Wireless  
Infrastructure  
Association

August 4, 2025

**VIA ELECTRONIC FILING**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
45 L Street NE  
Washington, DC 20554

**Re: Notice of *Ex Parte* Presentation, Implementation of State and Local Governments' Obligation to Approve Certain Wireless Facility Modification Requests Under Section 6409(a) of the Spectrum Act of 2012, WT Docket No. 19-250; Upper C-Band (3.98 GHz to 4.2 GHz), GN Docket No. 25-59.**

Dear Ms. Dortch:

The Wireless Infrastructure Association ("WIA"),<sup>1</sup> pursuant to Section 1.1206 of the Federal Communications Commission's ("FCC" or "Commission") rules,<sup>2</sup> hereby provides notice that on July 31, 2025, the undersigned, along with Patrick Halley, President and CEO of WIA, Madeline Sorg, Government Affairs Manager, and Abigail Hicks, Government Affairs Intern, met with Commissioner Olivia Trusty along with Krista Senell and Will Holloway of the Commissioner's office.

During the meeting, WIA highlighted the many positive effects that the FCC's wireless infrastructure reforms have had on wireless deployment and the critical importance of maintaining and strengthening the FCC's wireless siting rules. WIA emphasized the important role of wireless networks in the larger AI ecosystem and expressed its support for ensuring consistent siting rules for all AI infrastructure, including wireless networks, as described in the administration's recently announced AI Action Plan.<sup>3</sup>

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<sup>1</sup> The Wireless Infrastructure Association ("WIA") is the principal organization representing companies that build, design, own, and manage telecommunications facilities throughout the world. WIA's members include infrastructure providers, carriers, and professional services firms.

<sup>2</sup> 47 C.F.R. § 1.1206.

<sup>3</sup> *America's AI Action Plan* (July 2025), <https://www.whitehouse.gov/wp-content/uploads/2025/07/Americas-AI-Action-Plan.pdf>.

In order to continue to facilitate wireless infrastructure deployment, WIA urged the Commission to initiate a Notice of Proposed Rulemaking (“NPRM”) in response to the 9th Circuit’s decision in *League of California Cities et al., v. FCC*.<sup>4</sup> In that decision, the court largely upheld the Commission’s Declaratory Ruling in the 5G Upgrade Order but determined that changes to the Commission’s definition of “concealment element” needed to be facilitated through a notice and comment rulemaking.<sup>5</sup> WIA emphasized how impactful the FCC’s permitting reforms have been and the need for certainty in their availability going forward.

WIA additionally expressed its support for the reinstatement of the Commission’s spectrum auction authority and urged expedient action to make more licensed spectrum available for commercial uses. Consistent with prior comments in the record, WIA specifically encouraged timely action on adopting rules for an auction of the Upper C-Band.<sup>6</sup>

WIA also highlighted ongoing issues members face when utilizing the Universal Licensing System (“ULS”), and the Antenna Structure Registration (“ASR”) platform specifically. WIA’s members access these systems multiple times a day to facilitate wireless deployment. However, these systems frequently take an unreasonably long time to return results, with persistent and significant delays during normal working hours when many users are trying to access the system. This presents real barriers to proceeding with planned deployments. Consistent with prior recommendations,<sup>7</sup> WIA urged the Commission to consider improvements to these systems to mitigate delays.

Pursuant to Section 1.1206 of the Commission’s rules, a copy of this letter is being filed via ECFS. Please do not hesitate to contact the undersigned with any questions.

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<sup>4</sup> No. 20-71765 (9th Cir. Sept. 13, 2025).

<sup>5</sup> *Id.* at 60 (finding the clarifications regarding Concealment and Siting Approval Conditions were legislative rules requiring a rulemaking process).

<sup>6</sup> See Reply Comments of WIA, *Upper C-Band (3.98 GHz to 4.2 GHz)*, GN Docket No. 25-59 (May 29, 2025).

<sup>7</sup> See Comments of WIA, GN Docket No. 24-214 at 7-8.

Respectfully submitted,

/s/ Michael Saperstein

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/s/ Stephen Keegan

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**WIA – The Wireless Infrastructure Association**

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