Working Together to Ensure Americans are Wirelessly Connected During COVID-19

COVID-19 has created considerable challenges for our country and our cities and towns, and protecting the health and safety of our communities remains paramount. Wireless networks are a crucial part of that effort: first responders, patients needing virtual healthcare, children learning remotely, and employees fortunate to work from home, to name a few, all rely on wireless in these difficult times.

To meet America’s increased demand for connectivity, the wireless industry needs to continue deploying network infrastructure, including in areas where we see new demand driven by COVID-19. We also recognize the challenges and constraints that states and municipalities and their employees now face. At the same time, we share a common goal: ensuring that wireless facilities can be deployed efficiently so we can meet the greater demand for connectivity without creating more burdens on localities.

We are seeing some communities working creatively to keep everyone safe and keep us building. To facilitate more effective coordination between wireless providers and localities, CTIA offers these best practices for consideration, modeled on the efforts of communities that have adopted flexible procedures to review wireless facility applications. These practices reflect that many government employees are working remotely and in such a situation, wireless permits can still be addressed quickly, efficiently, and with a minimal burden on local government offices.

State and Local Government Best Practices for COVID-Related Permitting Issues

Leverage Online Processes Where Possible. Localities that have online permitting systems accessible to remote employees are encouraged to continue processing all applications and requests to facilitate the continued rapid deployment of wireless infrastructure.

Waive Original Documentation Requirements. Localities should consider allowing electronic (e.g., email, PDF, fax) receipt and processing where possible, including for 1) accepting, granting, and issuing applications 2) building and siting permits 3) facilitating right-of-way access and 4) requesting additional information. Original documents could be sent, as necessary, after states of emergency or similar orders are lifted.

90% In looking at their connectivity, over 90% of Americans place the most importance on having a stable network and consistent data speeds throughout COVID-19. (Harris X survey, late March)
State governors should provide certainty to localities that original documentation, public meeting, and similar requirements may be waived during the states of emergency or similar orders.

**Conduct Hearings and Meetings Online.** When possible, localities are encouraged to conduct hearings and meetings by conference call or video conferencing to accommodate multiple participants and allow the public to participate.

**Work to Go Digital.** If a locality does not have an online permitting system or video conference capabilities, it should consider collaborating with relevant applicants/service providers to establish such electronic processing portals and conferencing solutions. These solutions would offer benefits to localities both during and after COVID.

**Facilitate Electronic Historic Reviews.** For any state historic preservation office (“SHPO”) whose files are electronic and searchable, historic reviews should continue during the state of emergency. If SHPOs do not have digital processing, states and localities should consider putting such systems in place, which would offer benefits both during and after COVID.

**Follow DHS Guidance.** Governors and mayors should follow guidance from the Department of Homeland Security’s recently revised (Version 2.0) “Essential Critical Infrastructure Workforce” guidance and the list of critical infrastructure orders related to travel and work during the COVID-19 state of emergency.

**Offer Tolling Agreements Where Needed.** If a locality does not have online permitting or other electronic (e.g., email, PDF, fax) access and cannot act in a timely manner on applications, it should consider offering applicants broad tolling agreements, offering to toll the deadline for action on those applications for 30 days and covering all of the applicant’s currently pending applications and any additional applications filed during the state of emergency or similar order.

### How the Wireless Industry is Helping

The wireless industry is committed to working with state and local partners to keep constituents connected during these unprecedented times. That’s why wireless providers are committed to:

1. Helping state and local partners, including SHPOs, go digital to facilitate permitting and related approvals by providing tools and services like free or low-cost online permitting and/or electronic conferencing capabilities for a set time period.

2. Providing clear instructions to government employees and the public on how to use online permitting systems, set up conference call/video accounts, organize and participate in virtual meetings, and leverage any other electronic capabilities offered by industry to the state or locality.

3. Remaining flexible in “truing up” any original documentation necessary following the state of emergency or similar order, including by digitally signing an affidavit to provide original/raised-seal documents to the locality within a specific time after the emergency or similar order is lifted.