



January 19, 2021

Mr. Warren Hart
Deputy County Administrator
Greene County Economic Development Corporation
411 Main Street
Catskill, NY 12414

RE: Greene County Cellular Communications Project: Collaboration and Data Sharing

Dear Mr. Hart,

On behalf of CTIA, the trade association for the wireless communications industry, I write in response to a recent communication from the Greene County Legislature requesting that CTIA's members participate in Greene County's Cellular Communications Project. While we agree that accurate broadband mapping is essential to addressing issues of digital equity, we believe that the County's project is unnecessary given existing federal efforts as well as raises significant concerns from a cybersecurity standpoint.

CTIA shares Greene County's goal of advancing broadband deployment and adoption across the County, and wireless carriers have been on the forefront of efforts to meet those goals. In fact, the need for connectivity has clearly been thrust into the spotlight over the past year due to the ongoing COVID-19 crisis that has impacted us all. Strong wireless networks enable distance learning for students separated from teachers; telehealth for patients and doctors; employees to work from home; small businesses to shift online; older adults to stay in touch with family and combat social isolation; public safety personnel to utilize the best resources for their, and our safety; and so much more.

CTIA strongly supports ubiquitous mobile broadband coverage and the wireless industry has been on the cutting-edge of promoting broadband deployment to meet ever-growing consumer demand. In 2019, the wireless industry built more than 46,000 new cell sites across the U.S.—more than in the preceding three years combined. Last year's wireless industry investment, totaling \$29.1 billion, marked a four-year high.¹ Nearly 10 percent of the GDP

¹ See CTIA, "2020 Annual Survey Highlights" (Aug. 25, 2020), available at <https://api.ctia.org/wp-content/uploads/2020/08/2020-Annual-Survey-final.pdf>; last accessed 1/11/2021.



increase of the entire U.S. economy from 2011–19 was due to the growth of the U.S. wireless industry. U.S. 4G networks support 20 million jobs, drove nearly \$700 billion in economic contribution last year alone, and have saved consumers \$130 billion annually over an extended period of time.²

In terms of providing broadband coverage where needed, both Congress and the Federal Communications Commission (FCC) are taking steps to improve the collection and dissemination of data on broadband availability. In March of 2020, with strong bipartisan support, Congress passed the Broadband DATA Act, which built on prior steps to improve data collection and mapping at the FCC.³

Among other things, it:

- Set strong parameters for service availability data collected from mobile broadband providers to ensure accuracy;
- Strengthened enforcement against providers that submit inaccurate broadband data;
- Required the FCC to collect granular service availability data from wired, fixed wireless, and satellite broadband providers, and allowed the FCC to consider whether to collect verified coverage data from state, local, and tribal governments, as well as from other entities;
- Created a process for state, local, and tribal governments, consumers, and other groups to challenge FCC maps with their own data; and
- Established a crowdsourcing process that will allow the public to participate in data collection.

In addition to the Greene County proposal being unnecessary and duplicative of federal efforts, we have concerns regarding the proposed data-gathering process. Specifically, we have concerns surrounding the role of a third-party vendor aggregating proprietary and confidential information with no insight as to how this information would be safeguarded and protected. The deployment of wireless infrastructure nationally amounts to tens of billions of dollars in annual investment by wireless carriers. These massive investment decisions and

² See Recon Analytics, “The 4G Decade: Quantifying the Benefits” (July 29, 2020), *available at* <http://reconanalytics.com/wp-content/uploads/2020/07/The-4G-Decade-1.pdf>; last accessed 1/11/2021.

³ Codified at 47 U.S.C. §641 et seq.



deployment plans rely on proprietary information that each wireless carrier utilizes to make business decisions, fill coverage gaps and enhance capacity network needs where needed.

Cybersecurity and information security threats from both domestic and transnational actors threatens the business continuity and public trust in all sectors of the economy. The release of this information to a third party represents significant potential risk to CTIA member competitiveness and a security risk should the chosen vendor suffer a cyberattack. There are simply too many unknowns associated with this process for our members to cooperate, particularly as the wireless industry is a key stakeholder in the FCC efforts currently underway.

CTIA respectfully recommends that Greene County pause any broadband data collection requirements until it has a better understanding of what the ongoing federal efforts will produce and what, if any, additional data is needed. In addition, it is important to emphasize that the industry has been consistently focused on expanding coverage, only to have those efforts thwarted. Twice now, the industry has advocated for small wireless facility language that has been included in the Governor's Executive Budgets, only to see the legislature reject the proposals. Additionally, legislation addressing wireless collocation has similarly been rejected by the legislature. Both proposals would greatly facilitate wireless expansion. We would welcome the opportunity to work with you on small cell legislation and to repeal a recent \$200 million fee on fiber used for broadband deployment that was adopted by the legislature in 2019 and arbitrarily tied to the providers' usage of the State's public rights-of-way.

Moving forward, the County should instead focus their efforts on directly funding broadband projects and digital adoption initiatives. These efforts will work best with the uniform national framework on data collection and mapping that the FCC is creating.

Sincerely,

Bethanne Cooley
Assistant Vice President
State Legislative Affairs