



489 McLeod
Livermore, CA 94550

T 925-899-1999
bob@beacondev.net

June 8, 2020

PROJECT REQUEST LETTER

Crown Castle Small Cell
44 SIMMS ST., SAN RAFAEL, CA 94901
Crown Castle Project ID: [SFB005m2](#) / [SF90XS2H0](#)

Nature of Request

On behalf of Crown Castle Fiber, this letter and attached materials are to apply for a Cellular Telecommunications Facility Use Permit to install a small cell wireless facility at the above-mentioned location.

The following is a project description of the designed facility, the project purpose and justifications in support of this proposal.

Property Location

The Project site is located at on the north side of Simms St. This is public Right of way within City of San Rafael.

Project Description

The proposed location for our facility currently consists of a 42'-10" utility pole on the north side of Simms St. This is an existing PG&E-owned wood JPA pole that will house the new facility.

Crown Castle proposes to place an antenna, within a radome, and affix the antenna to the existing pole with a side-mounted equipment chassis. The centerline of the antenna will be at approximately 26'-9". The antenna is 14.6" in diameter by 2' tall. PVC conduit that will conceal the cables. The facility will have one radio unit, one Fiber panel box, one power disconnect and one meter. The equipment will be mounted between 7'-4" off the ground up to approximately 16 feet above ground level. All of this equipment will be painted to match the color of the existing utility pole. All work will be done on the pole; there will be no ground equipment or ground disturbance. Our proposal is depicted in the attached design drawings.

This is an unmanned facility that will operate at all times (24 hours per day, seven days per week) and will be serviced about once per year by a technician. Our proposal will greatly benefit the area by improving wireless telecommunications service as detailed below.

SMALL WIRELESS/SMALL CELL PERMIT APPLICATION CHECKLIST NARRATIVE ITEMS

Qualification of the proposed as a small wireless facility as defined by the FCC in Code of Federal Regulations, Title 47, §1.6002(l). = [Please find our material, specifically an FCC License for Sprint \(end carrier\) and a CLEC/CPCN approval for Crown Castle.](#)

Whether and why the proposed wireless facility meets each required finding for a small cell permit as provided in Section 7(c) of Resolution 14621. = Crown Facility falls within the defined requirements as set forth by the FCC, additionally as Crown is a CLEC, we are operating within our rights to operate in the PROW.

Identify where the project falls in terms of location preference and structure preference: Per San Rafael, this area is 'not preferred' as it is located within a residential zone, but the FCC provides support of this location as we are located within the PROW as other Public Utilities operate.

Include detailed justification for project not located in the most preferred location/structure: Per our discussions with San Rafael, we do understand this "site" is located within a residential zoning district, but as we operate within the PROW, and we need coverage, this location meets the FCC standard. While we are sensitive to locating a small cell site in a residential zone, the site is being deployed due to cellular demand. Please also note, wireless carriers cannot deploy a macro site due to potential visual impact, therefore a small cell deployment is not only favorable from a visual standpoint but also adheres to FCC guidelines. It is also important to advise; the FCC order does not require a carrier to justify the 'need' based on location.

Emergency Response and E911 Coverage

E911 coverage is a major concern for Crown Castle. 80% of all 911 calls are made by mobile phones and 50% of all Americans have no landline phone connection. If there is no coverage in the area, those calls may not be able to connect placing lives in danger. Emergency services also uses wireless technology to communicate with dispatch, colleagues, and other services. In short, the seamless and uninterrupted coverage provided by Crown at the Project site is a matter of health, safety and welfare, not merely one of convenience.

Statement of Operations

The WCF only requires power and fiber optic services. No nuisances will be generated by the Project, nor will the Project injure the public health, safety, morals or general welfare of the community. Crown technology does not interfere with any other forms of communication devices whether public or private.

Upon completion of the proposed installation, fine-tuning of the Project may be necessary, meaning the Project will be adjusted once or twice a month by a service technician for routine maintenance. The Project is also self-monitored and connects directly to a central office where sophisticated computers alert personnel to any equipment malfunction or breach of security.

Because the Project will be unmanned, there will be no regular hours of operation and no impact to existing traffic patterns. Existing public roads will provide ingress and egress allowing access for the technician who arrives periodically to service the site. No on-site water or sanitation services will be required as a part of this proposal.

Zoning Analysis

Crown is submitting the accompanying complete application to install its telecommunications network facilities in accordance with your code, ordinances and regulations. Please be advised the Federal Communications Commission (FCC) has adopted Rules and Regulations that impact how you must process this application. In addition, state law also limits your regulation of Crown's access to the public rights of way.

Compliance with Federal Regulations

Crown (as the owner of the facility) will not only comply with all FCC rules governing construction requirements, technical standards, interference protection, power and height limitations, and radio frequency standards, but ensure our respective tenants do as well. In addition, the company will comply with all FAA rules on site location and operation. Attached to this application is a letter detailing the new regulations, time lines and requirements that we are now following.

Noise Study

The radios are passively cooled so there are no conditioning units or cooling fans. The equipment does not make any noise or sounds. The equipment specifications are in the drawings.