

# Future of Tower Sites Depends on Preserving the Past

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At the end of 2000, the Advisory Council on Historic Preservation (ACHP) projected that by March 2001, its new tower siting proposal which impacts review of colocation and new construction of towers would be ready. With the anticipated growth of third generation wireless devices, space on existing towers will become tight.

ACHP's current proposal allows co-location on existing towers if a complaint has not been filed with the FCC and if existing buildings or structures less than 45 years old are not listed or ineligible for the National Register of Historic Places.

To address the influx of telecommunications projects since the passage of the Telecommunications Act of 1996, the ACHP formed the Telecom Working Group this year that includes the FCC, telecommunications carriers, the National Association of Broadcasters, the National Conference of State Historic Preservation Officers, several state politicians, tribal representatives, and the National Trust for Historic Preservation. The group is scheduled to meet through next year to develop a comprehensive review process for existing and new tower sites.

At issue are environmental concerns with which wireless licensees must comply under Section 106 of the National Historic Preservation Act. The ACHP wants to ensure there is no adverse impact on historic properties as new towers are erected. The goal of the ACHP is to more effectively collocate equipment on existing structures instead of building more towers in sensitive areas. Section 106 rules require the FCC to approve any wireless facility located on a historic site. Unlike other federal agencies, which communicate directly with state historic preservation officers, the FCC has delegated this authority to the licensee.

A co-location agreement has been drafted as an interim step to help the FCC and ACHP work out details on how to handle Section 106. However, the ACHP worries that some properties will slip through the cracks. Currently the FCC is not aware of all historic properties on which towers are sited, although all tower owners are required to register their towers with the FCC. On the other side of the coin is the fact that non-compliant tower site owners may not want to offer historic site information about their property if it will negatively impact their business.

Review of a site by a state historic preservation officer can require measures such as hearings and archaeological digs, which can extend the review process up to 90 days or longer. Reviews like that delay service and can put the aggregate industry costs of getting sites approved into the billions of dollars.

The positive take on this situation is that some state historic preservation associations would like to encourage antenna sitings on historic properties if historic buildings can serve the needs of all parties. The revenue would be positive for the site and the historic buildings could be saved from future development.

The ACHP's next meeting is in March in Little Rock, Arkansas. The overarching goal there will be to

foster a better fit between local regulations and the federal review process, which in the end is only advisory. Contact the ACHP for more information at 202-606-8503 or [achp@achp.gov](mailto:achp@achp.gov), or visit their website at [www.achp.gov](http://www.achp.gov).

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