



Crown Castle
200 Spectrum Center Drive
Suite 1700
Irvine, CA 92618

January 31, 2022

VIA UPLOAD TO PORTAL

Andrew Leon
Planner
City of Mercer Island
9611 SE 36th Street
Mercer Island, WA 98040-3732

RE: WCF21-036, 8215 SE 78th St, Mercer Island

Dear Mr Leon:

I am providing the additional materials requested in response to your compliance review letter dated January 4, 2022, for the following referenced Application. Below I will note each item listed on the review as missing or incomplete and provide a response to satisfy each item of record.

- 1. 47 CFR section 1.6100(b)(7)(iii) states that for towers in the public right-of-way, the installation of any new equipment cabinets on the ground is considered a substantial change to an existing wireless communication facility if there are no pre-existing ground cabinets associated with the structure. The site plan indicates that a new 16.25" W x 17.25" D x 48" H ground mounted electrical meter will be installed in the public right of way. As such, this proposal does not meet the exemption criteria of §6409 of the Spectrum Act and does not qualify as an eligible facility request. Please resubmit an application for a modification to an existing small cell facility that includes all the required submittal materials.**

Crown Response: Please see revised application and construction drawings

- 2. MICC 19.06.075(A)(1) states that ground-mounted equipment in the rights-of-way is prohibited unless such facilities are placed underground or the applicant can demonstrate that pole-mounted or underground equipment is infeasible. If ground-mounted equipment is necessary, then the applicant shall submit a concealment plan pursuant to MICC 19.06.075(G). In the new application for a modification to an existing small cell facility, please revise the location of the equipment cabinet so it is not ground mounted or provide a concealment plan for the cabinet consistent with MICC 19.06.075(G).**

Crown Response: Please see revised drawings, the proposed meter pedestal is painted to match the existing telco pedestal adjacent to the pole. Crown Castle is proposing to install a standard electrical meter pedestal that is common industry equipment for metering. The proposed Myers MEUG16 is designed to be placed on finished grade, not underground. Undergrounding electrical equipment would pose a public safety concern. Any equipment placed underground would require a vault/pump so that accumulation of water is removed rapidly. Pump failure would have additional liability. In addition to the limitations for placing this meter underground, are the limitations to place a meter on the pole. In addition to design restrictions, PSE prohibits the placement of carrier's meters on poles. Upon further assessment of the area, there are existing

meter pedestals currently being used for other purposes. This fact establishes a precedence in which Crown Castle is asking for relief to MICC 19.06.075(A)(1).

- 3. MICC 19.06.075(C)(13) requires all cables and wires to be routed through conduit along the outside of the pole. The provided plans show that the facility's wires are proposed to be exposed between the top of the main conduit and the antennas and between the bottom of the main conduit and the equipment cabinets. In the new application for a modification to an existing small cell facility, please revise the plans to show that all cables and wires will be contained within conduit from the antennas to the equipment cabinets.**

Crown Response: Please see revised construction drawings (A1.2, D1.1).

Please review & let me know if you have any questions.

Best,

John Halminski
Project Manager