



## DEPARTMENT OF TECHNOLOGY SERVICES

Marc Elrich  
County Executive

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Chief Information Officer

April 7, 2021

### MINUTES OF TFCG MEETING

To: Distribution

From: TFCG Staff (CTC Technology & Energy)

A meeting of the Transmission Facility Coordinating Group (TFCG) was held on April 7, 2021. The following people were in attendance:

#### MEMBERS

Marjorie Williams	(via video)	TFCG Chair
Patricia Wolford	(via video)	DPS
Boyd Lawrence	(via video)	MCPS
Thomas Williamson	(via video)	DGS
Daryl Braithwaite	(via video)	Takoma Park
Martin Rookard	(via video)	WSSC
Michelle Grace	(via video)	M-NCPPC
Felicia Hyatt	(via video)	OMB
Benjamin Berbert	(via video)	M-NCPPC

#### STAFF

Shawn Thompson	(via video)	CTC
Julie Elias	(via video)	CTC
Heather Elliot	(via video)	DTS
Zeena Oduro	(via video)	DTS

#### OTHER ATTENDEES

Javad Shayan	(via video)	DPS
Brian Kim	(via video)	DPS

#### **Action Item: Meeting Minutes**

**Motion:** Martin Rookard moved that the March minutes be approved as written. Boyd Lawrence seconded the motion. Benjamin Berbert abstained as he was not at the meeting, and the motion was otherwise unanimously approved.

#### **Action Item: Consent Agenda**

**Consent Agenda**

1. ***Application Number:*** 2020121333 ***Type:*** Minor Modification ***Received (date):*** 12/4/2020

***Revised:*** 2/23/2021

***Revised:*** 3/3/2021

***Applicant:*** Crown Castle on behalf of Verizon Wireless

***Site Name/Location:*** Oakmont Monopole/ 16801 Oakmont Ave, Gaithersburg

***Zoning Standard:*** IM-2.5 ***Property Owner:*** 16801 Oakmont Avenue LLC

***Description:*** Verizon Wireless proposes the installation of (3) panel antennas.

***Tower Coordinator Recommendation:*** Recommended. Recommendation subject to compliance with all applicable laws.

<https://montgomerycountytfcg.s3.amazonaws.com/Applications/MC2020121333+Application.pdf>

2. ***Application Number:*** 2021021377 ***Type:*** Minor Modification ***Received (date):*** 2/1/2021

***Revised:*** 3/3/2021

***Revised:*** 3/17/2021

***Applicant:*** Jacobs on behalf of AT&T Wireless

***Full Corporate Name of the Facility Owner:*** New Cingular Wireless PCS, LLC

***Site Name/Location:*** Educational Systems FCU/ 15901 Frederick Rd, Rockville

***Zoning Standard:*** CRT-1.5 ***Property Owner:*** Montgomery County TCHRS FCU

***Description:*** Removing (3) existing ALU antennas and replacing with (3) new NNHH-65B-R4 Antennas. Removing (6) existing remote radio heads and replacing with (3) new B25/66 320W AHFIB Remote radio heads and (3) new B5 160W AHCA Remote radio heads. Installing (3) new B12/14/29 370 AHLBBA remote radio heads.

***Tower Coordinator Recommendation:*** Recommended. Recommendation is subject to compliance with all applicable laws.

<https://montgomerycountytfcg.s3.amazonaws.com/Applications/MC2021021377+Application.pdf>

3. ***Application Number:*** 2021021389 ***Type:*** Minor Modification ***Received (date):*** 2/9/2021

***Revised:*** 2/18/2021

***Revised:*** 3/12/2021

***Applicant:*** Advantage Engineers on behalf of T-Mobile

***Site Name/Location:*** Park Montgomery Apts/ 8860 Piney Branch Rd, Silver Spring

***Zoning Standard:*** R-H ***Property Owner:*** Park Montgomery Limited Prtnrshp

***Description:*** Install equipment inside existing RAC 35 enclosure on rooftop and install power upgrade.

***Tower Coordinator Recommendation:*** Recommended. Recommendation is subject to compliance with all applicable laws.

<https://montgomerycountytfcg.s3.amazonaws.com/Applications/MC2021021389+Application.pdf>

4. ***Application Number:*** 2021021393 ***Type:*** Minor Modification ***Received (date):*** 2/16/2021

***Revised:*** 3/24/2021

***Applicant:*** Jacobs on behalf of AT&T Wireless

**Full Corporate Name of the Facility Owner:** New Cingular Wireless PCS, LLC  
**Site Name/Location:** Classic Residence/ 8100 Connecticut Ave, Chevy Chase  
**Zoning Standard:** R-10 **Property Owner:** SNH CCMD Properties LLC  
**Description:** Relocate AT&T's existing Beta sector. Swap (3) antennas (1) per sector and (6) Radio units (2) per sector. Proposed Antenna Model: (3) Commscope NNHH-65C-R4 Proposed Radio Units Model: (3) Nokia AirScale RRH 4T4R B5 160W AHCA and (3) Nokia B14/12/29 Triband RRH AHLBBA  
**Tower Coordinator Recommendation:** Recommended. Recommendation is subject to compliance with all applicable laws.  
<https://montgomerycountytfcg.s3.amazonaws.com/Applications/MC2021021393+Application.pdf>

5. **Application Number:** 2021021394 **Type:** Minor Modification **Received (date):** 2/17/2021  
**Revised:** 3/1/2021  
**Revised:** 3/12/2021

**Applicant:** Site Link Wireless on behalf of T-Mobile  
**Site Name/Location:** Montgomery Towers/ 415 Silver Spring Ave, Silver Spring  
**Zoning Standard:** R-10 **Property Owner:** Montgomery Towers LLC  
**Description:** This is an existing rooftop site with a height of 57'. T-Mobile proposes to modify their existing installation by removing and replacing (6) antennas at the 83' RAD. The proposed new antennas will be (3) Ericsson AIR 6449 B41 (33.1"x20.6"x8.6") and (3) RFS APXVAALL24 43-U-NA20 (95.9"x24.0"x8.5"). They will also remove (3) and install (6) RRU's: (3) 4449 B71+B85 and (3) 4415 B25. They will install (2) cabinets.  
**Tower Coordinator Recommendation:** Recommended. Recommendation is subject to compliance with all applicable laws.  
<https://montgomerycountytfcg.s3.amazonaws.com/Applications/MC2021021394+Application.pdf>

6. **Application Number:** 2021021396 **Type:** Minor Modification **Received (date):** 2/19/2021  
**Revised:** 2/22/2021  
**Revised:** 3/1/2021

**Applicant:** General Dynamics on behalf of AT&T Wireless  
**Full Corporate Name of the Facility Owner:** New Cingular Wireless PCS, LLC  
**Site Name/Location:** Wentworth House/ 5411 McGrath Blvd, N Bethesda  
**Zoning Standard:** CR-4.0 **Property Owner:** LCOR North Bethesda Residential One, LLC  
**Description:** AT&T to add an emergency self-contained diesel generator.  
**Tower Coordinator Recommendation:** Recommended. Recommendation is subject to compliance with all applicable laws.  
<https://montgomerycountytfcg.s3.amazonaws.com/Applications/MC2021021396+Application.pdf>

Tower Committee received comments from a resident of the county concerning item #5 on the consent agenda, application #2021021394. The comments from the resident were focused on issues concerning RF emissions. For the last year and a half, the Tower Coordinator has requested

that applicants submit an RF report when an application is not categorically excluded. Submitting this report is not a requirement by the County, and in many cases the industry gives us resistance. The comments received from the resident were in line with similar comments received over the last year and a half concerning these reports. In the report, the exact make and model of an antenna is not always used for making the predictive model. For these building sites, frequently there are many colocations of carriers on the same rooftop. When one company is putting together the report, they may not have the proprietary information for other carriers on the same rooftop. When they do not have that information, they will use their best knowledge of the industry standard, but it may not be the exact make and model. In this case, because the proposed antenna is brand new, they do not have the exact specifications for this and so the company making the report used a similar antenna model to create their RF environment model for this application.

When the Tower Coordinator is reviewing these reports, we consider what the application is required to demonstrate per the County's regulations. The regulations ask the applicant to provide a description of any steps that have been or will be taken to prevent the aggregate RF from exceeding exposure limits. When we compare the report with these assumptions to what the regulations ask for, we feel the applicant has met the requirement of providing an explanation, which is why you see a recommendation from the Tower Coordinator. The resident's comments asked about the estimated information, but we find that even with the assumptions made by the applicant in the report, the report satisfies the requirements of the County.

Debbie Spielberg asked why we would feel comfortable recommending an application with theoretical data included. Shawn Thompson explained that these reports are put together prior to the installation work being done and are predictive in nature. The report describes its methodology and notes the assumptions being made. One such assumption is for equipment from other carriers. It notes that they are not certain of the information and so will put in place a setup that is understood to be typical of the other carrier to approximate the RF emissions from the other carrier. This would be used to create the overall model of the RF environment. Shawn Thompson explained that the FCC talks about this report and that it is meant to be an approximation to determine where signs and barriers need to go, and outlines that the methodology to create this report is such that you should be able to use the report to place signs on site and will catch any areas that would exceed exposure limits.

Shawn Thompson mentioned that the comments received from the resident explained that the carrier is using these assumptions in this model to under count antennas on top of the building to simulate compliance. When reviewing the report, we see reasonable assumptions and ones that are allowed by the County. As an RF Engineer, we look at these reports differently than a layperson. The antennas in question are highly directional. It is very rare that an antenna from one carrier is going to influence another antenna. So even if the count is slightly off, it would not impact the signs needed to be posted for the proposed work.

Shawn Thompson confirmed that even though the information in the report is not specific, it is based on reasonable assumptions and is still recommended to the committee. To bring the site into compliance, the carrier may be required to put in place mitigation measures such as locks restricting access to the site, signs that alert laypeople and occupational workers to the hazard, and barriers. While there may be areas that are over the limits, they take these measures to prevent people from walking in front of those areas. We ask ourselves "have they provided an explanation

of what needs to be done as per the FCC to mitigate access to areas of exposure?” We believe this has been done.

Debbie Spielberg asked if the mitigation measures are ever verified after the installation. Margie Williams did not want to speak on behalf of DPS asserting what they do or do not check or if they are checking the signage after installation. Patricia Wolford noted that this would fall under the building permit inspection and might be conducted by a 3rd party inspector. Debbie Spielberg asked if a condition would be put on the application for DPS to check. Margie Williams was uncomfortable recommending on the condition that DPS be required to do a survey or RF check that they may or may not have the capability to perform. It was agreed to recommend the application on the condition that the applicant must submit a picture back to the TFCG of the signage on the building and the antennas installed once the installation is built, and Shawn Thompson summarized the language to be included in the recommendation: “Because the RF reports submitted with the application notes that a similar antenna was used for the RF emissions simulation, this application is recommendation on the condition that the service provider, within 30 days of installation, will provide photo evidence that the correct antenna models as were proposed have been installed, and that the signs and barriers are installed as per the FCC’s requirements.”

Daryl Braithwaite noted that the committee’s vote did not depend on it, but that it would be nice to have a DPS staff member walk the committee through the verification steps they take in their inspection. Margie Williams agreed it would be helpful to know what inspections may or may not be happening. She also noted that we have been working on possible changes to the TFCG regulations for the past 6 months that would help address these concerns, though nothing had yet been drafted.

Margie Williams moved agenda item #5 to the regular agenda, and asked if the committee had further questions on the other applications on the consent agenda. Martin Rookard moved to recommend the consent agenda with the exception of item #5. Thomas Williamson seconded the motion. The motion was unanimously approved. Felicia Hyatt abstained from voting on consent agenda item #2.

**Regular Agenda:**

Martin Rookard moved to approve the application moved from the consent agenda to the regular agenda (#2021021394), with the conditions as outlined by Shawn Thompson. Thomas Williamson seconded the motion. The motion was unanimously approved.

**Previously TFCG-Recommended Application for Reconsideration**

- 1. Application Number: 2020051165 Type: Minor Modification Received (date): 5/20/2020  
*Revised: 5/26/2020*  
*Revised: 11/11/2020*  
*Revised: 3/5/2021**

*Applicant: Advantage Engineers on Behalf of T-Mobile*

*Site Name/Location: Takoma Business Center/ 6930 Carroll Ave, Takoma Park*

**Zoning Standard: CRT-1.5** **Property Owner: Takoma Business Center LLC**  
**Description: Remove and replace three antennas. Add three RRHs at 110' on an existing 110' building.**  
**Tower Coordinator Recommendation: Recommended. Recommendation is subject to compliance with all applicable laws.**  
<https://montgomerycountytfcg.s3.amazonaws.com/Applications/MC2020051165+Application+1.pdf>

As there were new committee members Marjorie Williams asked Shawn Thompson to summarize why the committee was reconsidering this application. Shawn Thompson noted that reconsidering an application is unusual in the history of the TFCG. From June through November 2020, the TFCG received 29 applications that had the same antenna model or two antenna models, which were all recommended. In early December, we received an application that had different information, which led us to reconsider the applications. The original 29 listed the antenna output at 300 Watts, below 1000 Watts which is the threshold set by the FCC to categorically exclude an application from needing further reporting on the RF environment. The December application actually indicated a higher wattage. We reached out to the FCC to get the filing for the product, and found the output was in fact higher than what had been listed. At that time, we reached out to DPS to see what the status of these applications were in their process because they had already been recommended by our committee. Some had applied for permits and had received the permits already. DPS agreed that of these 29, any application which had not yet been issued a permit would be on hold until reconsidered by the TFCG, and those issued a permit would not have the permit finalized until the applications were corrected with correct output figure.

Shawn Thompson clarified to the committee that changing the output figure would not change CTC's recommendation; either figure is an allowable figure. We contacted all applicants for these applications, and noted that three changes would be needed: 1) change the output figure in the application to the correct figure; 2) indicate that the application is not categorically excluded and check off that a routine environmental assessment was required instead; and 3) submit the RF report. The applicant has done these three things, we have reviewed it and found it is compliant and complete.

The committee received comments on this application as well, which were essentially a few asks: 1) that the DPS permit be revoked because the permit was based on inaccurate information; 2) the TFCG delay voting until onsite visit to the roof can be conducted to perform our own check; 3) the applicant provide information on why the errors were made and took several months to correct. CTC issued our recommendation at this time because in our review, we did not find any regulation that has not been met, so we issue our recommendation to the committee.

Marjorie Williams responded to the question of if the applicant needed to file a new application with DPS because they were incorrect, noting that DPS was comfortable moving forward with

the TFCG application updated with the committee's recommendation. Shawn Thompson clarified that the reason the error was not caught in our first review was that the specification sheet for the equipment did not account for the gain of the antenna which focuses the energy. On the surface it looked correct but when we later learned it was not so we wanted to bring it back through the committee.

Felicia Hyatt asked to confirm that the applicant cured the three concerns the Tower Coordinator had with the original application. Shawn Thompson affirmed that all three things had been fixed. Debbie Spielberg noted that in the comments received by residents, they highlighted that in the RF report that the summary of the analysis, it notes that areas of concern be confirmed with onsite measurements. Shawn Thompson agreed that the report noted this, and that since the report is predictive in nature, it is not a substitute for actual measurements once the antennas are installed. We see this language sometimes as boilerplate but the reports that are submitted may not reflect the actual onsite environment and that language is frequently included by the company to note that the report is predictive in nature and that there could be differences between the predictive model and actual measurements.

Daryl Braithwaite noted that the original RF report received had a minor typo that was flagged – the report noted ground level in a few places and meant roof level. She noted that it was not a cause for concern and that the report was still able to meet the FCC's requirements.

Boyd Lawrence motions to recommend the reconsidered application, Felicia Hyatt seconds the motion. The motion passes unanimously, save for Benjamin Berbert who had to leave and thus abstained from voting.