



October 2, 2024

Otero County  
Board of County Commissioners  
1101 New York Avenue  
Alamogordo, NM 88310

**RE: Comments on Otero County Telecommunications Ordinance Revision Process**

Dear Commissioners Barela, Marquardt and Matherly:

CTIA®, the trade association for the wireless communications industry, is writing to express our concerns regarding the revision of Otero County’s Telecommunications Ordinance. Potential provisions to increase fees as well as modify the application process, among others, will impede the deployment of wireless infrastructure. We respectfully request the opportunity to collaborate with the County on this process in advance of Ordinance adoption to ensure the Ordinance fosters continued investment in wireless infrastructure.

CTIA members are eager to work with Otero County to bring the benefits of fifth-generation (“5G”) and broadband wireless services to the County’s residents, schools, and businesses at a time when demand for wireless services could not be greater. Americans used more than 100 trillion MB in 2023 – the largest single-year increase in wireless data ever and nearly double the amount of data used just two years ago. To meet this demand, our members are investing tens of billions of dollars annually to update the nation’s wireless networks, including in New Mexico, where the wireless industry supports more than 63,000 jobs and generates \$5.3 billion in annual GDP growth.

As you consider modifications to the Ordinance, it is important to understand the interconnectedness between and among the demand for wireless services from consumers, flexible infrastructure policies, industry investment and ultimately, the industry’s provision of efficient service. Since no draft Ordinance has been made public yet, we encourage the County to work with wireless industry stakeholders to design policy concepts that foster flexibility in installation of infrastructure that ensures meeting both the needs of, and impacts on, the community. This includes encouraging deployment of both macro towers as well as small cells, minimizing burdensome and excessive obligations on providers, and limiting associated fees to what is required for the County to manage its rights-of-way in accordance with state and federal laws.

Specific to this last item, we have concerns regarding the existing fee structure in Otero County, especially if a new Ordinance maintains it. The current application fees, review costs and recurring charges for collocations, modifications or the installation of new towers are disproportionately high, imposing significant financial burdens on wireless service providers. Given the competitive nature of the wireless industry and the increasing demand for enhanced connectivity, excessive fee burdens stifle investment.

Looking ahead, we strongly encourage the County to work with providers to craft reasonable, predictable regulations that promote and encourage investment and expand high-quality service as



well as preserve the county's role. We would welcome the opportunity for further in-depth discussions and look forward to further collaboration to achieve a comprehensive and equitable Ordinance that benefits all residents and communities in Otero County.

Sincerely,

*Annissa Reed*

Annissa Reed  
Director  
State and Local Affairs