



October 23, 2024

The Honorable John Cruikshank  
Mayor of Rancho Palos Verdes  
30940 Hawthorne Blvd.  
Rancho Palos Verdes, CA 90275

**RE: Comments on Potential Amendments to Chapters 12.18 (Wireless Facilities on Public Rights-of-Way and 17.76 (Wireless Facilities on Private Property)**

Dear Mayor Cruikshank and Members of the Rancho Palos Verdes City Council:

CTIA®, the trade association for the wireless communications industry, respectfully submits these comments on the City's recent discussion of the status of wireless telecommunications coverage throughout the City.

From supporting local businesses, schools, and families to ensuring public safety and resiliency of our infrastructure, strong wireless connectivity is essential to this community, especially at a time when the growth in demand for wireless services has grown at historic rates. In 2023, Americans used more than 100 trillion megabytes of data, the largest single-year increase ever and double that of two years ago.<sup>1</sup> To meet this demand, the wireless industry invested \$30 billion in private funds last year to improve the nation's networks. This, in turn, supports economic growth, including in California, where the wireless industry supports 580,000 jobs and generates \$73 billion annually in GDP.<sup>2</sup>

We appreciate the City's willingness to engage with our members about potential modifications to the Municipal Code to respond to this consumer demand, promote resilient networks, and improve wireless coverage. The wireless industry strongly recommends flexibility in installation of various types of wireless infrastructure that ensures meeting the needs of the community.

Small cell technology plays an important role in our networks, effectively expanding network capacity while utilizing existing structures. It should be encouraged and incentivized. However, despite their increasing use, it is important to recognize that small cells do not remove the importance of macro facilities on cell towers and rooftops, which provide seamless coverage over a broader geographic area and are necessary for network resilience. There is a strong desire among our members to further invest in both types of infrastructure in the City, which is why regulatory flexibility that incentivizes deployment and meets the demands of specific communities is so critical.

We are committed to working with the City to ensure that residents have strong connectivity, support local economic growth, and improve the overall quality of life for the community. We would welcome the opportunity to meet with the Council and City staff to explore potential solutions.

Thank you again for the opportunity to share our feedback.

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<sup>1</sup> <https://www.ctia.org/news/2024-annual-survey-highlights>

<sup>2</sup> <https://www.ctia.org/the-wireless-industry/map/4g>



Sincerely,

*Annissa Reed*

Annissa Reed  
Director  
State and Local Affairs

Cc: Ramzi Awwad, Director of Public Works  
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