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May 29, 2026

Bobbie Singh-Allen
Mayor

Mr. Brendan Carr
Commission Chair
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Ms. Anna M. Gomez
Commissioner
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Darren Suen
Vice Mayor
District 1

Ms. Olivia Trusty
Commissioner
Federal Communications Commission
45 L Street, NE
Washington, DC 20554

Rod Brewer
Councilmember
District 2

RE: FCC Notice of Proposed Rulemaking, WT Docket No. 25-276

Dear Chairman Carr, Commissioner Gomez, and Commissioner Trusty:

Kevin D. Spease
Councilmember
District 3

On behalf of the City of Elk Grove, California (City), I write to express its opposition to the Federal Communications Commission's (FCC) Notice of Proposed Rulemaking (NPRM) in the matter of "Build America: Eliminating Barriers to Wireless Deployments.

Sergio Robles
Councilmember
District 4

While the City supports responsible telecommunications infrastructure deployment, we feel the FCC's proposed rule goes too far in preempting municipal authority and fails to account for the real costs and complexities of infrastructure management. The Commission should withdraw or substantially revise this proposal and adopt a more balanced approach that:

- Preserves local authority to manage public rights-of way and placement authority
- Recognizes local governments are entitled to compensation which reflects the full costs of wireless deployment, not an arbitrary national assessment of what costs "should" be
- Facilitates industry and local cooperation rather than heavy-handed federal mandates

We share the Commission's goal of bringing modern telecommunications options to communities that have waited too long for technological upgrades. But we also understand the realities on the ground, where local governments must reconcile deployment with wildfire risk, steep topography, historic downtowns, emergency evacuation routes, environmental protection, and fragile infrastructure that holds up our communities.

As you may know, local governments are extensively involved in the approval of wireless structures and facilities. In this regard, City Councils and Boards of Supervisors are elected to:

1. Serve the local community interests and subsequently ensure that wireless telecommunication structures and facilities adhere to local land-use ordinances and zoning regulations; and
2. Provide final approval for wireless telecommunication facilities and structure proposals that may be controversial and/or may pose a local health and safety risk.

Local elected leaders must evaluate proposals not simply as abstract deployments, but as physical structures placed near homes, schools, fire access roads, evacuation corridors, and critical community assets.

Congress spoke very clearly when drafting Sections 253 and 332 of the Communications Act. Under 47 U.S.C. § 253 (b) and (c), state and local governments retain the authority (and responsibility) to protect public safety, preserve service quality, safeguard consumer rights, and manage the public rights-of-way on fair and competitively neutral terms. For decades, this statute has formed the backbone of a cooperative federalism system that allows state and local governments to ensure the safety of telecommunications infrastructure while still accommodating new technology.

Also of concern is the NPRM's consideration of imposing accelerated timelines for application review. Jurisdictions with limited staff cannot accurately evaluate complex applications within a shortened or unreasonable time frame. Unrealistic timelines, therefore, threaten to silence the very people who must live with the consequences. If applications are rushed through or "deemed granted" without adequate review, the responsibility for any resulting harm rests not with the applicant, but with the local authority left to deal with the aftermath. Any accelerated process must ensure that all parties have due process with a fair and reasonable opportunity to be heard.

The City is deeply committed to facilitating the timely, safe, cost-effective deployment of telecommunications infrastructure. To this end, we have worked over the year to welcome wireless infrastructure while protecting the people who live closest to it. At the same time, Congress preserved state and local authority in such decisions for a reason, and communities cannot afford policies that place haste over safety, or uniformity over local judgement. Local procedures ensure transparency, fairness, legal compliance, and public input. These principles, which would be undermined by the NPRM, are essential for balancing rapid technological deployment with long-term community wellbeing.

For these reasons, the City urges the Commission to withdraw or substantially revise this NPRM.

Thank you for your consideration of these comments.

Sincerely,



Bobby Singh-Allen
Mayor
City of Elk Grove

