



Crown Castle
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Senate Public Utilities Committee
HB 478 -- Crown Castle Testimony
March 22, 2018

Good morning Chairman Beagle, Vice Chairman McColley, Ranking Member Williams, members of the committee, my name is Karmen Rajamani and I am a director of network real estate at Crown Castle, the leading nationwide provider of small cell networks. Crown Castle has experienced explosive growth in the last five years going from 1,800 employees to over 5,000 employees nationwide today. This includes 41 employees in Ohio. In another five years the number of employees here could double. Crown Castle has invested more than \$150 million in private capital on small cell projects in the last four years while working collaboratively with cities across Ohio.

We are helping to bring the future. We are not merely a fiber backhaul provider. We are a neutral host service provider and a public utility. We build, own, and operate communications infrastructure that serves multiple customers. While historically the four national wireless carriers have been significant customers, today we have over 6,000 customers such as hospitals, schools, libraries, and universities all over the country on our fiber and small cell networks – and that number continues to grow.

To be clear Crown Castle is not an agent of the wireless carriers. We are the owner-operator of our networks. We have heard the argument that all this bill does is create an “expedited process” and that we can and should accept the bill because the “old process” remains for us to use. We absolutely disagree. This bill *creates the process* for the installation of small cell networks in Ohio. If you look at line 250 of the bill the word “expedite” is ACTUALLY DELETED from Ohio Revised Code section 4939.02. Even if we assume that we could use some other burdensome slow lane process, by definition this bill discriminates against us by allowing the four wireless carriers, the cable operators, and video service providers expedited access to the right of way where Crown Castle cannot. That is not fair and it does not make sense.

Increasingly, different groups are approaching Crown Castle wanting to use our networks and services with innovative uses. Cities want to include our networks in their Smart City initiatives. They are interested in mounting equipment on our nodes to provide Wi-Fi for their citizens, to collect traffic and environmental data, and to mount security cameras. The future for Crown Castle is more like Netflix and Amazon, or a technology a student at The Ohio State University is dreaming up. But all of these innovations require infrastructure which is where Crown Castle’s network services come in. Please understand that our networks operate as one continuous piece. You need the nodes and fiber to make the network work. And our nodes are the same as what the wireless carriers build. However, HB 478 would stunt our ability to provide these networks, diminish wireless industry competitiveness, and prevent us from investing more resources in Ohio in the future.

The beauty of being a neutral host telecommunications service provider is that a single node location can service multiple users. As our photos demonstrate, a node can have equipment for multiple wireless carriers, equipment for police, and Wi-Fi equipment. Aggregating many different kinds of services on the same small cell network allows affordable service for all comers, meaning faster 5G deployment. Moreover, new innovative technology companies and Smart City initiatives would not be able to deploy their equipment using small cell networks unless they partnered with a wireless service provider, cable operator, or video service provider. Is this truly the intended result?

If this bill passes, Crown Castle will be forced to either litigate or stop investing in our Ohio infrastructure. We would have no means to access the right of way to deploy our networks and services.

With my respect to this process and appreciation for the opportunity to be heard, Crown Castle cannot support this legislation. It requires us to get a permission slip from our customers or, worse yet, from one of our competitors to access our own equipment in the right-of-way, something none of the other 13 states who have passed similar legislation require us to do.

We have proposed several remedies in the form of amendments that we believe address our and municipal concerns. Crown Castle respectfully requests these minor language changes to allow us to assist in deploying technologies the residents of Ohio demand. Thank you very much for your time today.