



240 Stockton Street, 3<sup>rd</sup> Floor  
San Francisco, CA 94108  
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*SENT via EMAIL*

February 10, 2021

Mr. Matthew Trieu  
Engineering Technician  
Private Development and Right of Way  
City of San Mateo, Public Works Department  
330 W 20th Avenue  
San Mateo, CA 94403-1338  
mtrieu@cityofsanmateo.org

Permittee: GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless  
Location: 5 W 37th Ave (37.534236, -122.294825)  
Site Name: CA\_SF\_SANMATEO\_101

**RE: Required findings for approval by the Sustainability and Infrastructure Commission (WC-2020-000019)**

Dear Mr. Trieu:

Modus LLC, on behalf of GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless, respectfully submits the enclosed response to the required findings for approval by the Sustainability and Infrastructure Commission.

The current San Mateo Municipal Code and Design and Engineering Standards do not accommodate 5G designs. As such, the only path forward under the Code is to seek a limited exception under Section 17.10.070(c), and obtain a Major Wireless Permit. The required findings under §7.10.070(c)(1) are listed below in bold with an explanation of how the application meets the findings:

**(A) the proposed wireless facility qualifies as a “personal wireless service facility” as defined in 47 U.S.C. § 332(c)(7)(C)(ii), as may be amended or superseded; and**

The proposal is for a “personal wireless service facility” as defined by 47 U.S.C. § 332(c)(7)(C)(ii).

**(B) the applicant has provided the Sustainability and Infrastructure Commission with a reasonable and clearly defined technical service objective to be achieved by the proposed wireless facility; and**

The purpose of this specific project is to enhance the network by providing additional data capacity through the installation of a small cell wireless facility. Small cell networks provide localized enhanced capacity for the Verizon Wireless data and voice network for pedestrians, motorists, visitors and residents as well as emergency services personnel and first responders. These networks supplement existing macro networks by offloading traffic from nearby macros and adding capacity in targeted areas often where there exists high density vehicular and pedestrian traffic or areas with difficult terrain that



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cannot typically be served by a macro facility. As this is a 5G facility, this site will also enable higher speed low latency applications to support the next generation of technological advances.

**(C) the applicant has provided the Sustainability and Infrastructure Commission with a written statement that contains a detailed and fact-specific explanation as to why the proposed wireless facility cannot be deployed in compliance with the applicable provisions in this Chapter; and**

The current design and engineering standards do not have an adopted design that is technically feasible for a 5G marketplace solutions on a street light pole. The 5G antenna and radio integrated unit cannot be shrouded due to the range of frequency being transmitted; any shrouding will render the unit ineffective and thus cannot fit into the radome antenna shroud that is included for street light pole designs in the City's current design standards.

**(D) the applicant has provided the Sustainability and Infrastructure Commission with a meaningful comparative analysis with the factual reasons why all alternative locations and/or designs identified in the administrative record (whether suggested by the applicant, the City, public comments or any other source) are not technically feasible or potentially available to reasonably achieve the applicant's reasonable and clearly defined technical service objective to be achieved by the proposed wireless facility; and**

Included in the application was an in-depth Alternative Site Analysis which included an evaluation of a 300 ft. radius around the subject pole within the Verizon identified search area to ensure that the proposed location was the least intrusive that also meet the City's location and structure preference type and state engineering standards. Based on the results of the alternatives analysis, the Applicant has demonstrated that there are no other viable less intrusive locations to place the small cell wireless facility that meets the City's standards for structural and location preference and that also complies with General Order 95 and relevant state engineering standards.

The design has also been revised to reflect design feedback received from the Department of Public Works including reducing the cable visibility. The cable port has been moved on the pole behind the antenna to allow the minimal cables from the antenna/radio unit to be swept tightly upwards behind the unit itself, reducing cable visibility. The proposed design is a standard 5G design being deployed in other Bay Area jurisdictions where Verizon has deployed 5G including San Jose and Fremont.

**(E) the applicant has demonstrated to the Sustainability and Infrastructure Commission that the proposed location and design is the least non-compliant configuration that will reasonably achieve the applicant's reasonable and clearly defined technical service objective to be achieved by the proposed wireless facility, which includes without limitation a meaningful comparative analysis into multiple smaller or less intrusive wireless facilities dispersed throughout the intended service area.**

The proposed location and design is the least non-compliant configuration that will reasonably achieve the reasonable and clearly defined technical service objective to be achieved by the proposed wireless



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facility. It includes a minimalist design that integrates the antenna and radio into a single unit which reduces the overall volume and size of the on-pole equipment, and thus reducing the overall visual impact of the facility.

Please do not hesitate to contact me should you have any questions or require additional information.

Respectfully,

Jacob Olander

Program Manager | 510-919-8293 | [Jolander@modusllc.com](mailto:Jolander@modusllc.com)

cc: Tracy Scramaglia, Senior Engineer | City of San Mateo Department of Public Works  
JoAnna Wang, Director of Government and Community Affairs | Modus LLC  
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Engineering Technician  
Private Development and Right of Way  
City of San Mateo, Public Works Department  
330 W 20th Avenue  
San Mateo, CA 94403-1338  
mtrieu@cityofsanmateo.org

Permittee: GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless  
Location: 1626 El Camino Real (37.552550, -122.314778)  
Site Name: CA\_SF\_SANMATEO\_157

**RE: Required findings for approval by the Sustainability and Infrastructure Commission (WC-2020-000026)**

Dear Mr. Trieu:

Modus LLC, on behalf of GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless, respectfully submits the enclosed response to the required findings for approval by the Sustainability and Infrastructure Commission.

The current San Mateo Municipal Code and Design and Engineering Standards do not accommodate 5G designs. As such, the only path forward under the Code is to seek a limited exception under Section 17.10.070(c), and obtain a Major Wireless Permit. The required findings under §7.10.070(c)(1) are listed below in bold with an explanation of how the application meets the findings:

**(A) the proposed wireless facility qualifies as a “personal wireless service facility” as defined in 47 U.S.C. § 332(c)(7)(C)(ii), as may be amended or superseded; and**

The proposal is for a “personal wireless service facility” as defined by 47 U.S.C. § 332(c)(7)(C)(ii).

**(B) the applicant has provided the Sustainability and Infrastructure Commission with a reasonable and clearly defined technical service objective to be achieved by the proposed wireless facility; and**

The purpose of this specific project is to enhance the network by providing additional data capacity through the installation of a small cell wireless facility. Small cell networks provide localized enhanced capacity for the Verizon Wireless data and voice network for pedestrians, motorists, visitors and residents as well as emergency services personnel and first responders. These networks supplement existing macro networks by offloading traffic from nearby macros and adding capacity in targeted areas often where there exists high density vehicular and pedestrian traffic or areas with difficult terrain that



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cannot typically be served by a macro facility. As this is a 5G facility, this site will also enable higher speed low latency applications to support the next generation of technological advances.

**(C) the applicant has provided the Sustainability and Infrastructure Commission with a written statement that contains a detailed and fact-specific explanation as to why the proposed wireless facility cannot be deployed in compliance with the applicable provisions in this Chapter; and**

The current design and engineering standards do not have an adopted design that is technically feasible for a 5G marketplace solutions on a street light pole. The 5G antenna and radio integrated unit cannot be shrouded due to the range of frequency being transmitted; any shrouding will render the unit ineffective and thus cannot fit into the radome antenna shroud that is included for street light pole designs in the City's current design standards.

**(D) the applicant has provided the Sustainability and Infrastructure Commission with a meaningful comparative analysis with the factual reasons why all alternative locations and/or designs identified in the administrative record (whether suggested by the applicant, the City, public comments or any other source) are not technically feasible or potentially available to reasonably achieve the applicant's reasonable and clearly defined technical service objective to be achieved by the proposed wireless facility; and**

Included in the application was an in-depth Alternative Site Analysis which included an evaluation of a 300 ft. radius around the subject pole within the Verizon identified search area to ensure that the proposed location was the least intrusive that also meet the City's location and structure preference type and state engineering standards. Based on the results of the alternatives analysis, the Applicant has demonstrated that there are no other viable less intrusive locations to place the small cell wireless facility that meets the City's standards for structural and location preference and that also complies with General Order 95 and relevant state engineering standards.

The design has also been revised to reflect design feedback received from the Department of Public Works including reducing the cable visibility. The cable port has been moved on the pole behind the antenna to allow the minimal cables from the antenna/radio unit to be swept tightly upwards behind the unit itself, reducing cable visibility. The proposed design is a standard 5G design being deployed in other Bay Area jurisdictions where Verizon has deployed 5G including San Jose and Fremont.

**(E) the applicant has demonstrated to the Sustainability and Infrastructure Commission that the proposed location and design is the least non-compliant configuration that will reasonably achieve the applicant's reasonable and clearly defined technical service objective to be achieved by the proposed wireless facility, which includes without limitation a meaningful comparative analysis into multiple smaller or less intrusive wireless facilities dispersed throughout the intended service area.**

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Please do not hesitate to contact me should you have any questions or require additional information.

Respectfully,

Jacob Olander

Program Manager | 510-919-8293 | [Jolander@modusllc.com](mailto:Jolander@modusllc.com)

cc: Tracy Scramaglia, Senior Engineer | City of San Mateo Department of Public Works  
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City of San Mateo, Public Works Department  
330 W 20th Avenue  
San Mateo, CA 94403-1338  
mtrieu@cityofsanmateo.org

Permittee: GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless  
Location: 2942-2944 S Norfolk St (37.544341, -122.284158)  
Site Name: CA\_SF\_SANMATEO\_133

**RE: Required findings for approval by the Sustainability and Infrastructure Commission (WC-2020-000020)**

Dear Mr. Trieu:

Modus LLC, on behalf of GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless, respectfully submits the enclosed response to the required findings for approval by the Sustainability and Infrastructure Commission.

The current San Mateo Municipal Code and Design and Engineering Standards do not accommodate 5G designs. As such, the only path forward under the Code is to seek a limited exception under Section 17.10.070(c), and obtain a Major Wireless Permit. The required findings under §7.10.070(c)(1) are listed below in bold with an explanation of how the application meets the findings:

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The proposal is for a “personal wireless service facility” as defined by 47 U.S.C. § 332(c)(7)(C)(ii).

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**(C) the applicant has provided the Sustainability and Infrastructure Commission with a written statement that contains a detailed and fact-specific explanation as to why the proposed wireless facility cannot be deployed in compliance with the applicable provisions in this Chapter; and**

The current design and engineering standards do not have an adopted design that is technically feasible for a 5G marketplace solutions on a street light pole. The 5G antenna and radio integrated unit cannot be shrouded due to the range of frequency being transmitted; any shrouding will render the unit ineffective and thus cannot fit into the radome antenna shroud that is included for street light pole designs in the City's current design standards.

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Included in the application was an in-depth Alternative Site Analysis which included an evaluation of a 300 ft. radius around the subject pole within the Verizon identified search area to ensure that the proposed location was the least intrusive that also meet the City's location and structure preference type and state engineering standards. Based on the results of the alternatives analysis, the Applicant has demonstrated that there are no other viable less intrusive locations to place the small cell wireless facility that meets the City's standards for structural and location preference and that also complies with General Order 95 and relevant state engineering standards.

The design has also been revised to reflect design feedback received from the Department of Public Works including reducing the cable visibility. The cable port has been moved on the pole behind the antenna to allow the minimal cables from the antenna/radio unit to be swept tightly upwards behind the unit itself, reducing cable visibility. The proposed design is a standard 5G design being deployed in other Bay Area jurisdictions where Verizon has deployed 5G including San Jose and Fremont.

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Respectfully,

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Program Manager | 510-919-8293 | [Jolander@modusllc.com](mailto:Jolander@modusllc.com)

cc: Tracy Scramaglia, Senior Engineer | City of San Mateo Department of Public Works  
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Engineering Technician  
Private Development and Right of Way  
City of San Mateo, Public Works Department  
330 W 20th Avenue  
San Mateo, CA 94403-1338  
mtrieu@cityofsanmateo.org

Permittee: GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless  
Location: 1001 Railroad Ave (37.560981, -122.315688)  
Site Name: CA\_SF\_SANMATEO\_190

**RE: Required findings for approval by the Sustainability and Infrastructure Commission (WC-2020-000025)**

Dear Mr. Trieu:

Modus LLC, on behalf of GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless, respectfully submits the enclosed response to the required findings for approval by the Sustainability and Infrastructure Commission.

The current San Mateo Municipal Code and Design and Engineering Standards do not accommodate 5G designs. As such, the only path forward under the Code is to seek a limited exception under Section 17.10.070(c), and obtain a Major Wireless Permit. The required findings under §7.10.070(c)(1) are listed below in bold with an explanation of how the application meets the findings:

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**(C) the applicant has provided the Sustainability and Infrastructure Commission with a written statement that contains a detailed and fact-specific explanation as to why the proposed wireless facility cannot be deployed in compliance with the applicable provisions in this Chapter; and**

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Included in the application was an in-depth Alternative Site Analysis which included an evaluation of a 300 ft. radius around the subject pole within the Verizon identified search area to ensure that the proposed location was the least intrusive that also meet the City's location and structure preference type and state engineering standards. Based on the results of the alternatives analysis, the Applicant has demonstrated that there are no other viable less intrusive locations to place the small cell wireless facility that meets the City's standards for structural and location preference and that also complies with General Order 95 and relevant state engineering standards.

The design has also been revised to reflect design feedback received from the Department of Public Works including reducing the cable visibility. The cable port has been moved on the pole behind the antenna to allow the minimal cables from the antenna/radio unit to be swept tightly upwards behind the unit itself, reducing cable visibility. The proposed design is a standard 5G design being deployed in other Bay Area jurisdictions where Verizon has deployed 5G including San Jose and Fremont.

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Engineering Technician  
Private Development and Right of Way  
City of San Mateo, Public Works Department  
330 W 20th Avenue  
San Mateo, CA 94403-1338  
mtrieu@cityofsanmateo.org

Permittee: GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless  
Location: 733 N San Mateo Dr (37.575853, -122.336789)  
Site Name: CA\_SF\_SANMATEO\_255

**RE: Required findings for approval by the Sustainability and Infrastructure Commission (WC-2020-000028)**

Dear Mr. Trieu:

Modus LLC, on behalf of GTE Mobilnet of California Limited Partnership d/b/a Verizon Wireless, respectfully submits the enclosed response to the required findings for approval by the Sustainability and Infrastructure Commission.

The current San Mateo Municipal Code and Design and Engineering Standards do not accommodate 5G designs. As such, the only path forward under the Code is to seek a limited exception under Section 17.10.070(c), and obtain a Major Wireless Permit. The required findings under §7.10.070(c)(1) are listed below in bold with an explanation of how the application meets the findings:

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