Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	Docket No. 25-276
Notice of Proposed Rulemaking on	)	
Eliminating Barriers to Wireless Deployments	)	

COMMENTS OF THE CITY OF ARLINGTON, TEXAS

December 29, 2025

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I. INTRODUCTION

The City of Arlington, Texas submits these comments[1] to establish for the record that the proposal in the Commission's Wireless Notice of Proposed Rulemaking[2] to extend the Commission's small cell rules[3] to macro cell towers and other wireless deployments, including shot clocks and limiting application fees,[4] lacks a predicate for action and is inconsistent with congressional directives outlined in the Communications Act.

II. IMPACT TO THE CITY OF ARLINGTON AND ITS CITIZENS

A. Arlington: The American Dream City

The City of Arlington is the 7th largest city in Texas, and the 50th largest city in the United States, boasting a population of approximately 400,000. Arlington is the "American Dream City" where thousands of citizens have made their American Dream a reality.

Arlington embraces this goal of serving as host to the American Dream, which is reflected in the scope and scale of development that Arlington's leadership and laws have facilitated. Arlington is home to a sprawling Entertainment District that includes: AT&T Stadium (home of the Dallas Cowboys), Globe Life Field (home of the Texas Rangers), Choctaw Stadium, Texas Live!, the National Medal of Honor Museum, Six Flags Over Texas, Hurricane Harbor, and many other entertainment venues. Arlington's work with telecommunications providers has ensured that each of these facilities is supported by both wired and wireless infrastructure, allowing these facilities to flourish in both the virtual and real worlds.

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[1] Arlington will be submitting more detailed comments and / or Reply Comments in this docket as part of a coordinated collection of local government communities.

[2] *In the Matter of Build America: Eliminating Barriers to Wireless Deployments*, WC Docket No. 25-276 (Rel. Sept. 30, 2025) ("Notice of Proposed Rulemaking" or "NPRM")

[3] 47 CFR § 1.6001 et. seq.

[4] NPRM at ¶ 5.

Arlington is open to all. We are here to meet the needs of our residents, our businesses, and our numerous visitors, all of whom have wired and wireless telecommunications needs that Arlington strives to meet.

B. Arlington Works with Providers to Fulfill the American Dream

In 2024, Arlington welcomed a record 16.3 million visitors, many of whom visited the attractions described above in the Entertainment District.[5] We are grateful that Texas Governor Greg Abbott recently congratulated Arlington for being a Tourism Friendly Texas Certified Community.[6] Additionally, the grand opening for the National Medal of Honor Museum earlier this year was attended by former President George W. Bush, Governor Greg Abbott, as well as U.S. Senators John Cornyn and Ted Cruz.[7]

Arlington has worked closely with the various telecommunications providers as they seek to deploy their wireline and wireless infrastructure. Arlington has implemented a robust online permitting system[8] with many automated and user-friendly features that allow for ease in submitting and processing applications for which Arlington has received significant positive feedback from applicants, especially telecommunications providers. Applicants for macro cell towers and other wireless deployments may use this system for any required permits, such as construction and electrical, to streamline deployments.

Upon receipt of an application for a macro cell tower or other wireless deployment, City staff: holds preapplication meetings with applicants to go over their application; provides applicants with helpful feedback and an opportunity to update exhibits and diagrams, if needed;

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[5] https://fortworthreport.org/2025/07/30/arlington-texas-announces-record-breaking-visitation-number-for-2024/ (visited 12/23/2025)

[6] https://gov.texas.gov/news/post/governor-abbott-congratulates-arlington-as-tourism-friendly-texas-certified-community (visited 12/23/2025).

[7] https://fortworthreport.org/2025/03/23/former-president-bush-gov-abbott-salute-medal-of-honor-recipients-at-arlington-museum-opening/ (visited 12/23/2025).

[8] www.arlingtonpermits.com (visited 12/23/2025).

and promptly sets such matters for public hearings for consideration and approval by the Planning and Zoning Commission as well as the City Council.

In these efforts, City staff cooperatively works with telecommunications providers to reach solutions on all matters related to deployment of their infrastructure. Wireless deployments in Arlington are successful and there is no need to change the standards for those processes.

C. Commission Action Disrupts the American Dream

Should the Commission mistakenly extend its small cell rules to macro cell towers and other wireless deployments as proposed in the NPRM, it will have several detrimental consequences.

The Commission's proposed action would disrupt the smooth permitting procedures that Arlington and providers alike have developed. Also, the Commission's proposed action would result in a disruption in the fees received by Arlington, which in turn support key municipal services to our citizens and visitors, including police, fire, streets, water, and parks. The consistent receipt of these fees helps Arlington to budget for crucial city services to serve our citizens and visitors, including essential public safety and traffic management services at special events, such as NFL and college football games, baseball games, the 2026 FIFA World Cup, concerts, and other events. Finally, the Commission's proposed action would limit Arlington's ability to effectively review, permit, and work to resolve issues with providers that will ultimately have a detrimental effect on the quality of life for our residents. Arlington's processes demonstrate a commitment to the American Dream, but the Commission's proposal could replace that dream with a nightmare.

D. Unfair Advantage for One Category of Provider

The Commission's proposal in the NPRM would limit Arlington's ability to guide deployments in a way that prevents placement of infrastructure at locations where they conflict

with other infrastructure or uses. This may cause major delays in current projects planned and may damage other existing infrastructure. It would also elevate and advantage one category of provider over all other users and undermine Arlington's ability to manage the community in a manner that safely accommodates all users.

Simply put, the Commission proposes to extend special treatment to the wireless industry that is unfair and inconsistent with the treatment of other utilities and entities using space in our community. Electric, gas, and other utility providers all compensate municipalities appropriately for their use of City time and resources under established state and local frameworks. Granting wireless providers preferential fee treatment or preempting municipal cost recovery would be unjustified and inequitable. Any preferential federal carve-out for one sector undermines that fairness and risks creating inconsistent regulatory expectations for local governments. The Commission would essentially be a providing subsidy to one (deep pocketed and well resourced) category of applicant, ***a subsidy paid by other applicants and local taxpayers***.

In addition, Congress has not given the Commission specific statutory authority or permission to impose a shot clock on permit approvals for macro cell towers and other wireless deployments. Given the stakes and impacts on local infrastructure, local budgets, local taxpayers, and other permit seekers, Arlington would urge the Commission to proceed carefully and refrain from imposing preemptions and shot clocks that do not have specific congressional authority.

III. SUPPORT OF COMMENTS BY OTHER LOCAL GOVERNMENTS AND LOCAL GOVERNMENT ORGANIZATIONS

In addition to the submission of these comments, the City of Arlington expresses its support for and wishes to be associated with the comments and other filings by certain local governments and affiliated organizations, including the Texas Coalition of Cities For Utility Issues, National League of Cities, U.S. Conference of Mayors, and National Association of

Telecommunications Operators and Advisors. Accordingly, the City of Arlington urges the Commission not to extend its rules to macro cell towers and other wireless deployments as proposed in the NPRM for the legal and operational reasons outlined by these other local government commenters.

IV. CONCLUSION

For all the foregoing reasons, the Commission should reject the proposals outlined in the NPRM.

Respectfully Submitted,

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