



May 25, 2026

Representative Kathleen James, Chair
House Committee on Energy and Digital Infrastructure
Vermont State House
115 State St
Montpelier, VT 05633

Representative R. Scott Campbell, Vice Chair
House Committee on Energy and Digital Infrastructure
Vermont State House
115 State St
Montpelier, VT 05633

RE: Comments on H. 527 and Current 30 VSA § 248a Policy Considerations

Chair James and Vice Chair Campbell,

On behalf of CTIA®, the trade association representing the wireless communications industry, I write to comment on the latest version of H. 527 and the related deliberations concerning Vermont's *30 VSA § 248a* siting law.

As you know, the House is considering final adoption of the Senate-passed version of H. 527. That version would extend Vermont's wireless infrastructure siting law for three years and add a requirement that large-scale wireless permitting projects receive a public hearing before a municipal body or planning commission. **Given the critical importance of predictability in wireless permitting, we strongly urge passage of the current version of H. 527. Any amendment that shortens the current three-year *Section 248a* sunset period would be inconsistent with the realities of wireless infrastructure development and could effectively function as a moratorium on future projects.**

Predictability is one of the core and essential principles underlying Vermont's *Section 248a* statute. Continued progress in improving network reliability across Vermont depends on timely investment in and deployment of wireless infrastructure. That, in turn, requires regulatory clarity because our members typically plan project budgets 18 to 36 months in advance. For large-scale cell tower projects, the timeline from initial project concept to service activation for that local community typically spans at least two years.

During House and Senate hearings on H. 527, several witnesses raised concerns about the current three-year *Section 248a* timeframe, noting that the present window can drive a surge of project applications as each sunset date approaches. That surge places additional pressure on municipalities and planning commissions, community stakeholders and the Public Utility Commission to impact, influence and adjudicate the permitting process. It is difficult to see how shortening the timeframe even further would reduce those burdens.



It is also important to recognize what would be at stake if Vermont's *Section 248a* law had to be reauthorized every year. In 2024 alone, U.S. consumers used a record 132 trillion megabytes of mobile data, surpassing the 100 trillion megabytes used the year before. Total U.S. wireless connections reached 579 million, or 1.7 per American. The infrastructure needed to support that demand – for public safety, emergency communications, broadband access and economic activity at minimum – is substantial and will continue to grow each year. Requiring annual reauthorization of Vermont's *Section 248a* law would effectively eliminate the predictability and clarity needed in this type of process, making it logistically impossible for wireless providers to meet the ongoing connectivity needs of Vermont communities.

Finally, we recognize the Committee's continued interest in the *Section 248a* process, including how it enables all stakeholders to effectively participate in wireless infrastructure permitting decisions in Vermont. Our members feel strongly that the current *Section 248a* framework already includes timelines, public comment opportunities and other safeguards that support this goal, but we remain willing to work with the General Assembly and other state officials on future examinations of the process. Also, the current Senate-passed version of H. 527 would not limit the legislature's ability to review *Section 248a* again before the end of another three-year sunset period.

Given the paramount importance of predictability and clarity needed for ongoing wireless infrastructure deployment in Vermont, we strongly urge passage of the current version of H. 527 and rejection of any amendments that would shorten the existing *Section 248a* sunset timeframe.

Sincerely,

Jeremy Crandall
Assistant Vice President
State Legislative Affairs