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March 15, 2023

**Via E-mail and Federal Express**

Ms. Carmen D. Diaz

Acting Secretary of the Board

New Jersey Board of Public Utilities

44 South Clinton Avenue, 1st Floor

P.O. Box 350

Trenton, New Jersey 08625-0350

**Re: Response to Request for Comments  
In Re Implementation of the Light Emitting Diode ("LED")  
Streetlight Program  
Docket No. QO22110710**

Dear Ms. Diaz:

This office represents New York SMSA Limited Partnership d/b/a Verizon Wireless ("VzW") with respect to land use matters in New Jersey. Please accept this brief letter as VzW's response to your March 1, 2023, request for comments in connection with the above-captioned matter related to incentivizing streetlight upgrades to Light Emitting Diode ("LED") technology.

By way of background, VzW is a Federal Communications Commission licensed wireless communications provider. In the course of deploying its network facilities, VzW regularly seeks to install Small Wireless Facilities<sup>1</sup> in the public rights-of-way, including on streetlight and other utility poles. Thus, the Board should be aware that the wireless carriers, such as VzW, have a natural interest in the availability of streetlights as collocation opportunities to install their antenna facilities.

As Board staff begins to develop policies and incentives to upgrade streetlights to use LED technology, VzW respectfully requests that it be included in these conversations and in any working group that is established to discuss these issues. VzW looks forwards to assisting the Board, and the EDCs, with meeting their energy efficiency goals.

<sup>1</sup> Unlike a traditional cell tower, a Small Wireless Facilities is compact and often installed on utility poles. They are defined by federal rule as facilities that are mounted on structures 50 feet or less in height including their antennas; or are mounted on structures no more than 10 percent taller than other adjacent structures; or do not extend existing structures on which they are located to a height of more than 50 feet or by more than 10 percent, whichever is greater. In addition, each antenna associated with the deployment, excluding associated antenna equipment, is no more than three cubic feet in volume; and all other wireless equipment associated with the structure, including the wireless equipment associated with the antenna and any pre-existing associated equipment on the structure, is no more than 28 cubic feet in volume. 47 C.F.R. 1.6002(l)

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ATTORNEYS AND COUNSELORS

Thank you for your time and attention to this matter. Please follow up with my office should there be any questions.

/s/ Edward W. Purcell

Edward W. Purcell, Esq.

ewp/

cc. Verizon Wireless (via email)  
Mr. Paul Lupo, Division of Energy, NJBPU (via email and FedEx)  
Brian Lipman, Esq., Director, Division of the Rate Counsel (via email and FedEx)