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**Relative to the installation of a 911 communications tower in the historic area of Saint Charles, MO**

Dear Sir or Madam,

I am the president of the Old Town Neighborhood Association that represents Ward Two in St. Charles, MO. We are very concerned about the effect of placing a 250' lattice tower with flashing lights in our historic area.

St. Charles was the first settlement on the Missouri River. Our Main Street has many buildings of both historic and cultural significance. Not the least of which is the first state capital building in Missouri. Also in very close proximity (700') to the proposed site is the historic Academy of the Sacred Heart. The chapel there contains the remains of Saint Rose Philippine Duchesne.

We have a thriving commercial historic district that is based on the special ambiance created by continuous blocks of historic structures that stretch nearly a mile. A 250' blinking tower will significantly detract from the commercial and cultural attraction of this very precious resource. Aside from the above affronts to our historic heritage, the proposed site sits so close to residences that it is within 150' of surrounding turn-of-the century homes – the homes, not the property lines. This clearly violates both county and city ordinances.

Additionally, the proposed tower will be in a flight path four miles from the runway at Lambert Field. In the case of a power failure, will there be a maintained secondary power source?

This is a densely populated area, particularly on weekdays as the offices, courts, jail, and most public services for the city *and county* are located along 2<sup>nd</sup> Street in Saint Charles within 2 blocks of the proposed tower. Clearly, this is not an appropriate location for a stand-alone communications tower of this height.

If it is necessary to broadcast from and to this immediate area, it would make more sense to attach the transmission paraphernalia to the Ameristar Casino next to Highway 70 which is taller than 250' and roughly 1 mile from the proposed site. There is also an industrial area to the north of our historic district close to the river. Surely, these would be more appropriate locations and both are around a mile from the proposed location.

Lastly, your instructions for submitting comments are confusing and overly burdensome. I would like a separate response from your office on this point.

I heard from city residents who could not make sense of your directions and website. Public input should be encouraged and the process should be designed to meet the needs of the public, not the convenience of FCC staff. *By posting the instructions for comments online only, you bar those who are not computer savvy and those who lack reasonable access to a computer and the internet from participation. This is a violation of civil rights as your regulations surely mandate public participation.*

The notice was not sent to affected members of the public. Few people actually get newspapers anymore. Therefore, you should notify property owners *and occupants* BY MAIL. Those within an area equal to five times the overall height of the proposed tower would be a reasonable group to include *in a metropolitan area*. Rural areas will need some other criteria for inclusion.

The FCC is misleading in its terminology and your website is a frustrating mess. The notice stated that one needed to file a "Request for Environmental Review" when, in fact, the drop down menu I used to access the appropriate link was labeled "ASR Environmental Notice". Figuring out this bit of deception didn't even get me to a form to fill out. The user is required to word process a separate document and attach it to the FCC "form". The website also had multiple links that took the user in a 'circle jerk' back to the same page. Was the intent to have fewer FCC

employees processing more pleadings or limiting public participation? Whatever the intent, the website and instructions in your notice are unacceptable and do not facilitate public participation.

'Appurtenance' - I am not sure what you mean by this uncommon term (see definitions below). Are you talking about additional equipment, an accessory of some sort, or adding some extra legal rights to the proposed 911 tower not enjoyed by other structures? Since you insert this term in the notice itself, please clarify.

Encarta Dictionary: English (North America)

ap·pur·te·nance (noun)

ap·pur·te·nance [ ə'pɜːtnəns ] ( ap·pur·te·nances )

1. accessory

an accompanying part or feature of something

(formal) (often used in the plural)

- an athletic club with all the usual appurtenances

2. property right

LAW a legal right or privilege attached to a property and inherited with it

ap·pur·te·nan·ces (plural noun)

ap·pur·te·nance [ ə'pɜːtnəns ]

equipment

the equipment needed for an activity

(formal)

I am submitting a third pleading because I just learned at this late hour that I needed to have my address and phone number on the pleading itself IN ADDITION TO THE COVER SHEET. If, after THREE submissions, I have not met all FCC rules for submitting comments, it only underscores my point. This is an issue that you should take seriously. I am taking it very seriously.

Sincerely,

Leann M. Starr  
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