



United States Department of the Interior

NATIONAL PARK SERVICE

P.O. Box 168
Yellowstone National Park
Wyoming 82190

IN REPLY REFER TO:

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xD5027

JUN 02 2014

Mr. Jeff Ruch
Executive Director
Public Employees for Environmental Responsibility
2000 P Street, Northwest, Suite 240
Washington, D.C. 20036

Dear Mr. Ruch:

This letter is in response to your April 29, 2014, letter where you requested additional information and updates on Yellowstone's *Wireless Communications Services Plan*. We thank you for recognizing the relevance of the Plan as we ourselves have found it to be a useful tool to protect park resources and values through limiting the types and locations of wireless services and infrastructure in Yellowstone National Park.

Old Faithful cell tower relocation efforts: Yellowstone's *Wireless Communications Services Plan Finding of No Significant Impact* (FONSI) states, "The Old Faithful cell tower will be relocated to an area near the Old Faithful fresh water treatment plant when it becomes feasible, to reduce the overall visibility of the tower." The active right-of-way permit for the existing water tank site contains language that advises the equipment owner to expect to move their equipment within the timeframe of the permit. Since that language was written, the NPS has conducted independent helium balloon tests (at varying heights) and found that equipment visibility would probably increase within the historic district and Upper Geyser Basin if siting at the water treatment plant occurred. Recently, Yellowstone received an application for a right-of-way permit to place a temporary cell on wheels (COW) at the water plant during a summer season. Given that the antenna on the proposed unit is adjustable, Yellowstone may benefit by gaining empirical visibility data that would be useful in determining whether the site is a feasible alternative. Yellowstone will need time to determine if the proposal is consistent with the *Wireless Communications Services Plan*.

Mount Washburn: In 2012, Yellowstone contracted with an A&E firm to assist with the conceptual design of a freestanding structure that would facilitate the migration of antennas off the Mount Washburn fire tower. Removal of antennas from the exterior would help protect the structure, restore the exterior integrity, improve equipment performance, and enhance visitor and

staff safety. The NPS found that project funding fell short of the actual cost of this structure and tabled the effort. Since that time, a cell service provider has contacted Yellowstone with the desire to explore the possibility of building a structure to park specifications that could benefit both Yellowstone and the provider. Should Yellowstone receive an application from the service provider for a structure on Mount Washburn, Yellowstone would consult with the Wyoming State Historic Preservation Office and any final design for a new structure would be available to the public prior to any substantial changes being implemented. Mount Washburn will continue to serve as the primary communications hub for Yellowstone, and will continue to have multiple antenna, dishes, and electronics equipment at the site.

Cell-phone free zones: The *Wireless Communications Plan FONSI* explains that cell coverage is restricted from Madison and Norris and other developed areas without overnight hotel accommodations. Under the current Wireless Communications Plan, the NPS will not issue permits to cell service providers or provide cellular service for visitor use in these areas as described in the FONSI.

Courtesy signing and protocols: Courtesy signs installed at Mammoth and Old Faithful help guide visitors in the use of mobile devices. All signs state, "As a courtesy to others, please silence your mobile device while enjoying Yellowstone's natural features." These signs provide universal guidance in the form of an icon depicting a mobile device with a silenced speaker. Cellular courtesy signs are located at four Old Faithful Upper Geyser Basin boardwalk entrances; near the Old Faithful Inn, Old Faithful Visitor Education Center, Hayne's Photoshops, and the Old Faithful Lodge. In the Mammoth area, three signs are located at the entrances to the Lower Terrace boardwalks and two signs are located at parking areas and the boardwalk access at the Upper Terrace Drive.

Yellowstone's Visitor Guide/Newspaper entitled *Yellowstone Today* instructs visitors, as a courtesy to others, to please silence your cell phone while enjoying Yellowstone's natural features. Current and archived copies of the newspaper can be downloaded at <http://www.nps.gov/yell/planyourvisit/yellowstone-today.htm>.

As a training requirement, resource education staff are expected to know the information in the official park newspaper and to be prepared to answer questions by visitors about any and all content contained in that publication including those having to do with cell phone service and courtesy protocols.

Courtesy outreach projects: Yellowstone has not received funding from cell service providers for outreach projects to educate visitors on adherence to cellular courtesy protocols.

"Wi-Fi" excluded from National Historic Landmarks: Yellowstone's *Wireless Communications Plan* attempts to establish Wi-Fi free zones to the greatest extent possible in historic lodges by limiting the locations that could be considered for public wireless internet access or Wi-Fi. The FONSI acknowledges that visitors who have purchased subscriptions from cell phone providers for wireless service for use with devices such as Blackberries, smart phones, and laptop computers would likely have access to the internet in these locations if cell phone service is available. Visitors will still be observed using computers in historic lodges even in the absence of installed Wi-Fi services. Experience has shown that network latency in

Yellowstone's interior has resulted in many visitors losing interest in all but the most basic low bandwidth intensive internet services. Concessioners are required to submit proposals for new wireless services to the Wireless Committee for review. Madison and Norris and other developed areas without overnight hotel accommodations are Wi-Fi free zones. Signs that describe the protocols for the use of mobile devices have not been installed on any of Yellowstone's National Historic Landmarks at this time.

Improved cellular coverage at Canyon and Tower: By moving to a directional sectored antenna design, service will improve at the Canyon developed area and electro-mechanical energy will be directed away from the visitor platform and fire watch residence. Signal strength has been poor (less than -95db) in the Canyon developed area under the existing (omni antenna) configuration. Down tilt adjustments to control cell signal spillover will take place during the testing of the approved antennas.

We appreciate your time and interest regarding resource issues in Yellowstone National Park and hope that the above information helps you to complete your analysis of the first five years of Yellowstone's *Wireless Communications Plan*.

Sincerely,

A handwritten signature in black ink that reads "Daniel N. Wenk". The signature is written in a cursive, flowing style.

Daniel N. Wenk
Superintendent

cc:

Dave Hallac
Lindsay Robb