

## Guidance for FCC Submittals: Above-Ground Resources

This guidance supplements, but does not replace, the FCC Nationwide Programmatic Agreement.

### Standard Submittal Requirements

Submit documentation in PDF format through our online INHERIT portal at: <https://heritage.ky.gov/compliance/Pages/overview.aspx>

#### For FCC Above-Ground Submittals, provide:

- Completed Section 106 Cover Sheet
- Transmittal letter (including the TCNS number)
- FCC Form 620/621
- Results of KHC Site Check
- Cultural Historic documentation sufficient to:
  1. Identify historic properties within the APE
  2. Evaluate National Register eligibility (if applicable)
  3. Assess effects

**Note:** Above and below ground submittals should be two **separate documents** submitted together. Archaeological information must not be included in above-ground documentation.

### Area of Potential Effects (APE)

All submissions must define and justify both:

- Direct APE—area of ground disturbance
- Indirect (Visual) APE—area within which the undertaking may introduce visual effects

#### Recommended Research Parameters

The following distances may be used as a starting point for defining the visual APE but must be adjusted based on:

- Tower height
- Topography
- Surrounding built environment
- Visibility

#### Typical Starting Points

- Small Cell Node ( $\leq 50$  ft): ~500 ft
- Collocation ( $\leq 8$  stories): ~500 ft
- Collocation ( $\geq 9$  stories): up to 1,000 ft
- Small towers ( $\leq 85$  ft): ~1,000 ft
- Taller towers: Case-by-case analysis per NPA
- Satellite Earth Stations ( $\leq 10$  ft): ~1,000 ft

## Documentation Expectations

Submissions must include:

- Maps showing Direct and Visual APE
- Photographs demonstrating existing conditions and visibility
- Identification of historic properties within the APE
- Evaluation of effects, including:
  - No historic properties affected
  - No adverse effect
  - Adverse effect

## Reduced / Abbreviated Review

Reduced documentation may be appropriate where:

- The undertaking qualifies as excluded under the FCC NPA, or
- There is clearly no potential to affect historic properties

Please coordinate with KHC prior to submitting abbreviated documentation.

For inquiries pertaining to ongoing FCC above ground submittals, please email [Kimberly.Busby@ky.gov](mailto:Kimberly.Busby@ky.gov).

## Guidance for FCC Submittals: Archaeological Resources

Above and below ground submittals should be two **separate documents**.

### For FCC Archaeology Submittals, we require:

- Section 106 Cover Sheet
- Transmittal letter (including the TCNS number)
- Map(s) showing Area of Potential Effect (APE)
- Photographs depicting the APE
  - Any discussion of disturbance requires thorough photo documentation
- Results of Office of State Archaeology full records review
- When applicable, an archaeological survey report based on our *Specifications for Conducting Fieldwork and Preparing Cultural Resource Assessment Reports* (TCNS # should also be included on the cover of the report)

## Guidance for FCC Submittals – Archaeology Reduced APE

All archaeology submissions, regardless of reduced or standard APEs, should include full OSA site check results.

Sub-surface testing may not be required if the project area is less than 50 square meters, is fully disturbed, and/or if an archaeological site is not recorded within or adjacent to the project area.

For inquiries pertaining to ongoing FCC archaeology submittals, please email [Stephanie.Dooley@ky.gov](mailto:Stephanie.Dooley@ky.gov).