

ATLANTIC TECHNOLOGY GROUP

Amazon Dublin Campus Rooftop Cellular Signal Booster Installations

Administrative Review Team Submission Narrative

**6645 through 6685 Crosby Court
Dublin Ohio 43016**

Prepared September 2026

Review Request

Atlantic Technology Group requests Administrative Review Team approval for five rooftop antenna assemblies that support fixed in-building Nextivity CEL-FI QUATRA 4000c cellular signal-booster systems at the Amazon Dublin data-center campus. Each existing building will receive one compact, non-penetrating, ballasted roof mount positioned behind the existing data-center rooftop screening and well inside the roof perimeter. The proposed work improves indoor cellular voice and data service without establishing a new carrier cell site or adding a conventional telecommunications tower.

Project Summary

Property owner	VADATA Inc.
Site	Amazon Dublin data-center campus, 6645 through 6685 Crosby Court
Parcel	Franklin County parcel 275-000010-00
Legal description	Crosby Business Park, Part Lot 3
Parcel area	66.956 acres
Existing zoning	ID-3 Research Assembly District within the West Innovation District
Proposed facilities	Five rooftop assemblies, one on each existing data-center building
Typical rooftop assembly	ROHN JRM non-penetrating roof mount with a 5-foot mast and up to three Nextivity LPDA-R donor antennas
System served	Fixed in-building Nextivity CEL-FI QUATRA 4000c cellular signal booster

Requested Determination

The applicant asks ART to review these assemblies in proportion to their actual scale and function. The rooftop components are accessory elements of an indoor coverage system. They do not create a new macro-cell site, tower compound, or carrier radio-access facility. All five sleds will remain behind the existing rooftop screening. Review staff communicated during the process that this screened placement forms part of the basis for acceptance by the reviewing authorities, and the applicant accepts it as a siting condition.

Public Exhibit and Security Approach

Amazon security policies prohibit project photography by the applicant and its contractors and restrict public disclosure of interior facility layouts, equipment locations, pathways and access information. The public ART package therefore uses publicly available aerial and oblique imagery, sanitized exterior roof plans, representative sightline sections and equipment information. Interior cellular-distribution layouts are intentionally excluded because they are not necessary to evaluate the proposed rooftop assemblies.

System Purpose and Operation

The project addresses indoor cellular attenuation caused by the size and construction of the data-center buildings. Exterior walls, roof systems and interior materials reduce the commercial mobile signals available indoors. The QUATRA system receives existing off-air service through rooftop donor antennas and distributes that service within the same building through indoor network units, fiber hubs, coverage units and ceiling antennas. It does not originate an independent commercial mobile network.

How the Part 20 System Differs from a Conventional WCF

Characteristic	Proposed signal booster	Conventional cell site or tower
Primary function	Improves reception of existing licensed service inside one building	Creates or expands a carrier radio-access site and network capacity
Regulatory operation	Fixed in-building signal booster under 47 CFR 20.21, operating on a secondary, non-interference basis	Carrier facility operating under the carrier's primary spectrum authorization
Rooftop equipment	Passive LPDA donor antennas on a short ballasted mast	May include sector antennas, radios, cabinets and supporting infrastructure
Support structure	5-foot non-penetrating roof mount set back from roof edges	Tower, monopole or substantial rooftop support structure
Backhaul	No carrier backhaul is created by the booster installation	Typically connected to the carrier network by fiber or microwave backhaul
Ground development	None	May require a fenced compound, shelter, generator or utility work
Service area	Interior of the associated building	Broader outdoor or indoor network service area

47 CFR 20.21 requires signal boosters to protect licensed networks. Applicable safeguards include automatic self-monitoring, anti-oscillation controls, power-down behavior and operation on a secondary, non-interference basis. Operation must cease if the FCC or an affected licensee requires it. These controls are materially different from the operating characteristics of a carrier base station.

Proposed Rooftop Locations

The five markers identify the updated location of one non-penetrating donor-antenna sled on each building. Each marker sits behind the existing data-center rooftop screening. The Supplemental Visibility Exhibits provide a broader surrounding-area context, sanitized exterior roof plans and representative ground-level sightline sections. Final field coordination may refine the exact position to preserve access and maintain electrical and lightning-protection criteria, but every sled will remain behind the screening on the same building.



Figure 1 Updated sled locations behind existing rooftop screening

Building	Address	Proposed location
CMH051	6685 Crosby Court	Behind existing rooftop screening
CMH054	6675 Crosby Court	Behind existing rooftop screening
CMH057	6665 Crosby Court	Behind existing rooftop screening
CMH060	6655 Crosby Court	Behind existing rooftop screening
CMH063	6645 Crosby Court	Behind existing rooftop screening

Rooftop Assembly

Each building will use a ROHN JRM non-penetrating roof mount. The galvanized steel frame rests on an approved protective roof pad and uses concrete blocks as ballast. The assembly requires no roof penetrations or new structural foundation. The project team will determine ballast from the ROHN engineering tables using the final mast configuration, antenna loading, roof height and applicable wind criteria. The building owner or its roofing representative will approve the protective interface with the roof membrane.

Component	Proposed configuration
Roof mount	ROHN JRM ballasted non-penetrating mount, approximately 5 feet square
Mast	Nominal 5-foot mast; final mast diameter coordinated with antenna clamp and loading requirements
Donor antennas	Up to three Nextivity CEL-FI LPDA-R antennas per building, one for each supported mobile operator path
LPDA-R dimensions	1,280 mm long, approximately 50.4 inches
LPDA-R weight	1.6 kg, approximately 3.5 pounds, per antenna
Antenna mounting	Manufacturer-approved U-bolt connection to the mast; vertical polarization
Roof interface	Protective mat or pad beneath the frame; ballast placed within the mount trays

Visual Treatment

Every sled and donor-antenna assembly will be installed behind the existing data-center rooftop screening. Review staff communicated during the process that screened placement forms part of the basis for acceptance by the review board and reviewing authorities. The applicant accepts this as a required installation condition. The assemblies will also remain well back from the roof perimeter and outside normal ground-level sightlines from Crosby Court, Houchard Road, State Route 161 and adjacent properties. Building height, roof depth and inboard placement provide additional visual protection. The proposed 5-foot mast avoids the height and visual profile associated with a rooftop tower. No signage, lighting, fencing or ground-level compound is proposed.

Roof Access and Safety

The interior rooftop positions maintain separation from roof edges and reduce exposure during installation and maintenance. Placement will preserve service aisles, roof drains, mechanical clearances and access to existing equipment. The final installation will use the facility's approved rooftop access and fall-protection practices.

Electrical and Lightning Protection

The rooftop LPDA-R antennas are passive components and receive no separate electrical service. Coaxial cables connect the donor antennas to indoor network units. The indoor active equipment uses standard 120-volt plug-in power, while the system distributes communications and low-voltage DC power through manufacturer-approved cabling, including Power over Ethernet connections where applicable.

The proposed rooftop locations are intentionally within the protection zone of the existing building lightning-protection system. Final placement will maintain the required relationship to existing air terminals and conductors. Antenna masts, coaxial cable shields and surge-protection components will be bonded and grounded in accordance with the manufacturer's instructions, the National Electrical Code, the facility grounding plan and applicable local requirements. The work will not remove, relocate or reduce the effectiveness of the existing lightning-protection system.

Radiofrequency Operation and Network Protection

The QUATRA systems operate only in authorized commercial mobile frequency bands supported by the installed configuration. They receive existing carrier signals and retransmit them within the building. Under 47 CFR 20.21, signal boosters operate on a secondary, non-interference basis and must protect primary licensed services. The system's automatic network-protection functions remain enabled during operation.

- Automatic gain control limits operation when donor signals are excessive.
- Anti-oscillation functions detect and mitigate insufficient isolation between donor and indoor antennas.
- Automatic power-control behavior reduces or ceases transmission when required to protect the serving network.
- The system will use manufacturer-approved antennas, cables and coupling devices.
- Carrier consent and registration will be completed as required before operation.

Low Impact Installation

The installation uses an established FCC-regulated approach for fixed in-building cellular coverage in the United States. The architecture avoids carrier base-station equipment, new utility service, equipment shelters and outdoor backhaul infrastructure. Most active equipment remains indoors. The only exterior components are the passive donor antennas, short mast, ballasted mount, coaxial cables and required grounding and surge-protection components.

Response to ART Wireless Communication Facility Checklist

The following matrix identifies where this narrative and the supporting exhibits address the City checklist. Several conventional tower items do not apply because the project adds no tower foundation, carrier base station, backhaul network, equipment compound or new parcel development. The applicant will provide any additional site-specific confirmation requested by ART during review.

Checklist requirement	Status	Response or reference
Pre-submittal coordination	In process	ART review and project coordination are underway.
Electronic submittal	Provided	Narrative and exhibits are organized for electronic submission.
Legal description and property survey	Partial	Legal description and parcel information are stated in the Project Summary. Existing parcel boundaries remain unchanged. A formal survey can be supplied if ART requires it.
Project description and summary	Provided	See Review Request, System Purpose and Operation and Requested Determination.
Compliance with Section 99 and applicable law	Provided	See regulatory distinction, visual treatment, electrical and RF compliance sections. Final approval remains subject to City review.
Use of existing towers or alternative structures	Not applicable	The system requires one donor location on each building it serves. Existing rooftop structures do not provide the required combination of signal reception, cable pathway, lightning protection and indoor-system association.
Co-location statement for a new tower	Not applicable	No new freestanding tower or macro-cell site is proposed. Each assembly is a short accessory roof mount serving the building beneath it.
Backhaul entity contact information	Not applicable	The signal boosters use off-air donor signals and create no carrier backhaul connection.
Inventory of towers and distances	Not applicable	The project does not rely on or create a tower network. Figure 1 identifies all five proposed rooftop assemblies on the single campus parcel.
Structural support analysis	Conditional	The ROHN ballast tables are included. Final ballast and roof loading will be confirmed from the approved configuration and applicable project requirements.

ART Checklist Response Continued

Checklist requirement	Status	Response or reference
Scaled site plan	Provided with limitation	Figure 1 and Exhibit A identify the updated rooftop locations behind existing screening. Exhibit A also provides sanitized exterior roof plans and planning-level sightline sections. Final field coordination may refine exact positions, but every sled will remain behind the existing screening.
Adjacent land uses and zoning	Provided	The project remains within the existing ID-3 data-center campus. The rooftop work creates no new ground disturbance or change in land use.
Roadways and access points	Shown	Exhibit A shows the campus relationship to Dublin Plain City Road, Houchard Road, Crosby Road and surrounding properties. Security-sensitive roof-access information is intentionally omitted.
Setbacks and property lines	Provided by siting approach	All assemblies sit on existing buildings within the 66.956-acre parcel and well inside the roof perimeters. No ground setback changes are proposed.
Separation from other towers	Not applicable	The project uses low-profile rooftop booster antennas rather than new towers.
Topography	Not applicable	No grading, foundation or ground disturbance is proposed.
Landscape plan	Not applicable	No ground-level equipment, fencing or landscape change is proposed.
Elevation and material information	Provided	See Rooftop Assembly, Exhibit A and the ROHN and LPDA-R supporting information. The proposed mast height is nominally 5 feet; Exhibit A uses a conservative 7-foot maximum planning envelope.
Context photographs	Alternative provided	Amazon security policies prohibit project photography by the applicant and its contractors. Exhibit A provides publicly available aerial and oblique imagery, the updated screened sled locations, sanitized exterior plans and sightline diagrams.

Supporting Exhibits

Exhibit	Document
Exhibit A	Amazon Dublin ART Supplemental Visibility Exhibits, including surrounding-area context, sanitized exterior roof plans, existing screening and representative sightline sections
Exhibit B	ROHN JRM Non-Penetrating Roof Mount information and ballast tables
Exhibit C	Nextivity system-component and LPDA-R donor-antenna technical information
Exhibit D	City of Dublin Wireless Communication Facility Checklist

Applicant Commitments

- Install every sled and donor-antenna assembly behind the existing data-center rooftop screening, consistent with the siting condition communicated during review.
- Use a non-penetrating ballasted mount and an approved protective roof interface.
- Maintain the existing rooftop lightning-protection envelope and complete required bonding, grounding and surge protection.
- Coordinate final placement with roof access, drainage, mechanical clearances and facility safety requirements.
- Use only manufacturer-approved booster components and retain all network-protection features.
- Exclude security-sensitive interior layouts, equipment locations, pathways and access details from the public ART submission.

References

- [1] 47 CFR 20.21, Signal Boosters, Electronic Code of Federal Regulations, current as of September 2026.
<https://www.ecfr.gov/current/title-47/chapter-I/subchapter-B/part-20/section-20.21>
- [2] Nextivity, CEL-FI LPDA-R Antenna product information and specifications. <https://nextivityinc.com/antennas/lpda-r-antenna/>
- [3] ROHN, JRM Non-Penetrating Roof Mount product information and engineering ballast tables, included as Exhibit B.
- [4] Franklin County Auditor, parcel 275-000010-00, Crosby Business Park Part Lot 3, 66.956 acres.
- [5] City of Dublin, Case 22-133, West Innovation District, confirming ID-3 Research Assembly District zoning for the existing data-center campus.
- [6] City of Dublin Administrative Review Team Wireless Communication Facility Checklist, included as Exhibit D.