



Comcast
85 E Belcher Rd
Foxboro, MA

Via E-mail

August 4, 2026

Randolph Town Council
Town of Randolph
41 South Main Street
Randolph, MA 02368

Dear Members of the Randolph Town Council:

Comcast appreciates the opportunity to provide input regarding the Town of Randolph's consideration of zoning language related to data centers. We recognize and respect the Town's interest in ensuring that large-scale data center development is appropriately reviewed, sited, and regulated, particularly where such facilities may create significant energy, land use, infrastructure, or neighborhood impacts.

As the Council continues its review, Comcast respectfully suggests that you consider amendment(s) that include clear language distinguishing large-scale data centers from essential telecommunications, broadband, and network facilities. Without such clarification, a broadly worded definition of "data center" could unintentionally capture traditional telecommunications facilities, including broadband headends, hub sites, network interconnection facilities, wireless infrastructure, or emergency communications infrastructure that are materially different in scale, function, and community impact from large hyperscale data centers.

Telecommunications and broadband facilities are critical infrastructure. These facilities support residential and commercial connectivity, public safety communications, video distribution, network resiliency, and emergency communications during severe weather events, natural disasters, public health emergencies, and other community disruptions. They also must often be located in proximity to existing network architecture in order to serve residents, businesses, institutions, and municipal customers reliably.

For those reasons, we respectfully ask that you include the following language in zoning regulations around data centers:

Telecommunications Services Exemption

A structure or facility shall not be classified as a "data center" where the primary purpose of such facility is telecommunications services, including but not limited to wireline, wireless, broadband, or network interconnection services, or emergency communications infrastructure. Such facilities shall not be subject to the zoning, siting, or operational restrictions applicable to a data center.

This exemption would not prevent Randolph from regulating large-scale data center development. Rather, it would provide necessary clarity that essential communications infrastructure is not inadvertently swept into a regulatory framework intended for facilities of a fundamentally different scale, purpose, and impact.

By contrast, many modern data center regulations are intended to address large-scale facilities associated with high electrical demand, significant cooling systems, and intensive computing uses, including artificial intelligence, cloud computing, or large-scale digital storage. Comcast's local telecommunications facilities, including headends and hub sites, are significantly smaller in electrical load and physical scale than

hyperscale data centers and should not be subject to the same zoning, siting, buffering, or operational restrictions.

To avoid unintended consequences while preserving the Town's ability to regulate true large-scale data centers, Comcast also respectfully recommends that the Town adopt a definition that includes an appropriate electrical-load threshold and parcel-based limitation. Comcast's suggested language is as follows:

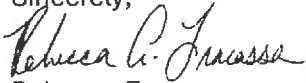
Recommended Data Center Definition

"Data center." A structure or multiple structures on one parcel that has a connected utility capacity greater than 10MW electricity load and may have an interruptible energy supply, generator, battery, or both; cooling systems, mechanical or evaporative or both; and other temperature control infrastructure. Composed of one or more businesses, owners, leaseholders, or tenants, the primary square footage function of the structure is the processing, computing, origination, storage, and transmission of digital information.

Comcast respectfully submits that these clarifications will help protect the Town's legitimate land use objectives while preserving the ability to maintain and improve reliable broadband, telecommunications, video, and emergency communications services for Randolph residents, businesses, and public institutions.

We appreciate your consideration of this request. Please do not hesitate to reach out with any questions or to discuss further.

Sincerely,



Rebecca Fracassa

Director, GCA, Metrowest & Southeastern MA