



January 16, 2017

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: RM-11778, *Fixed Wireless Communications Coalition, Inc., Request for Modified Coordination Procedures in Bands Shared Between the Fixed Service and the Fixed Satellite Service*

Dear Ms. Dortch:

I am writing in support of the petition filed by the Fixed Wireless Communications Coalition to improve parity in frequency coordination in the bands shared between the Fixed Service and the Fixed Satellite Service.

Burns & McDonnell is an engineering company. The Networks, Integration and Automation Department engineers microwave radio networks for electric utilities, which are classified as a Critical Infrastructure. Burns & McDonnell has been providing engineering services since 1898 is a worldwide engineering firm of about 5,000 people.

The microwave networks are the nerve center of any electric utility, providing a life sustaining service to the general public. It has our experience that when expanding or upgrading the microwave networks, in many cities, all of the 6 GHz channels have been previously assigned, leaving the utilities spending millions of dollars in unnecessary repeaters in the 11 GHz band. The 6 GHz band is ideal for paths between 10 and 25 miles and it is not affect by rain, whereas the 11 GHz band they are forced to use when there are no 6 GHz licenses available, are very susceptible to rain. Since electricity is considered Critical Infrastructure and literally, for some people, it is life sustaining, it is crucial that the electric utilities have reliable microwave networks. The proposed 4 GHz band by this petition would go a long ways in satisfying that need.

Allowing earth stations to coordinate the entire frequency band and the entire geostationary arc disadvantages the electric utilities fixed microwave networks. Applications for fixed frequencies take approximately 18 to 24 months to be constructed and granted a coordinated pair of frequencies for a microwave path. Whereas an earth station is allowed to dynamically change frequencies on the fly without coordination. Which service would want your life to depend on?

In conclusion, on behalf of the electric utility industry, which we all depend on, Burns & McDonnell respectfully asks the Federal Communication Commission to issue a Notice of Proposed Rulemaking based on the Fixed Wireless Communications Coalition's petition.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Tim Armintrout".

Tim Armintrout, PE



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