

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Unlicensed Use of the 6 GHz Band)	ET Docket No. 18-295
)	
Expanding Flexible Use in Mid-Band Spectrum)	GN Docket No. 17-183
Between 3.7 and 24 GHz)	

COMMENTS OF PORTLAND GENERAL ELECTRIC

Sania Radcliffe
Director, Government Affairs and Environmental Policy
Portland General Electric
Telephone: 503 464-7329

On behalf of Portland General Electric (PGE), I hereby file the following comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above-referenced proceeding. PGE would like to associate itself with the joint comments filed on behalf of the Utilities Technology Council (UTC), the Edison Electric Institute (EEI) and the National Rural Electric Cooperative Association (NRECA), which provide detailed arguments and supporting documents in opposition to this proposed rulemaking.

PGE opposes the proposal to expand the 6 GHz band to include unlicensed operations, which threatens to cause harmful interference to microwave systems that PGE uses to ensure the safe, reliable and secure delivery of essential energy to our customers. As described in more detail in the joint filings mentioned above, the potential for interference is unreasonably high. Moreover, the probability of the risk of interference to microwave systems cannot be sufficiently mitigated. The magnitude of the risk of interference is also high, given the importance of the essential services that depend on these microwave systems and the sensitivity of these microwave systems and the underlying utility applications they help to support. Finally, utilities lack reasonable alternatives, (especially in the urban area PGE operates in) to using the 6 GHz band, which is uniquely suitable for ensuring cost-effective communications reliability.

PGE would also urge the Commission to give serious consideration to the findings of the whitepaper submitted as an attachment to the joint comments referenced above. This whitepaper describes how utilities use communications to support their operations, and how unlicensed operators would compromise the design parameters of utilities' networks and underlying reliability requirements. As the joint comments noted, the whitepaper concluded that this proposal to allow unlicensed operations in the 6 GHz band could have significant, negative impacts on the reliability of utility communications networks in this band – an impact that will also threaten grid reliability.

PGE also supports the comments of the joint filings regarding the inability to protect against interference with utility communications by unlicensed operators. We too are concerned that such interference could result in outages or other accidents that will have negative consequences for our customers and for system reliability.

In closing, we urge the Commission not to adopt this proposal to allow unlicensed operations in the 6 GHz band. Doing so would pose a significant risk of interference in utilities' communications system, and the potential for interference cannot be effectively mitigated. We appreciate the Commission's consideration of Portland General Electric's comments.

Respectfully,

A handwritten signature in black ink, appearing to read "Sania Radcliffe", with a stylized flourish at the end.

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