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February 14, 2019

The Honorable Ajit Pai, Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: 6 GHz band, ET Docket No. 18-295

Dear Chairman Pai:

As the Federal Communications Commission (FCC) solicits comments on its proposal to allow unlicensed spectrum sharing in the 6 GHz band, I urge you to ensure that incumbent license holders, especially those critical infrastructure owners and operators that use the band for mission-critical communications, are protected from the interference that will be caused by it.

IID holds licenses in the 6GHz band that its networks rely on for mission-critical functions such as situational awareness, storm response, routine maintenance and tele-protection for the power grid. These wireless networks are essential to the safe, reliable, and efficient delivery of electricity service to our customers, therefore, making the 6 GHz radiofrequency spectrum critical for operations.

This proposal seeks to make more unlicensed spectrum available for WiFi and other uses—a notable goal. However, the 6 GHz band is already heavily used by utilities and other critical infrastructure industries like public safety, electric, water, gas and railroads. IID is concerned with the potential negative impact this proposal could have on the infrastructure systems already located on the 6 GHz band

Non-critical commercial wireless users have multiple spectrum options for their service; indeed, the FCC has already opened up additional spectrum in other bands that have yet to be used to their full potential. Unfortunately, utilities and other users in the 6 GHz band will have few if any other bands should they be forced to relocate.

Should you have any questions, please do not hesitate to contact me directly at 760-339-9041 or by email at aortega@iid.com.

Sincerely,



Antonio Ortega
Governmental Affairs Officer