



PUBLIC UTILITY DISTRICT NO. 1 of CHELAN COUNTY

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Date: February 15, 2019
From: Chelan County Public Utility District
327 N Wenatchee Ave
Wenatchee WA 98801

RE: Comment to FCC Proceeding 18-295 on Unlicensed Use of the 6 GHz Band

Chelan County Public Utility District owns and operates a dedicated 6 GHz microwave communication system for the purpose of transporting critical voice and data communication services necessary to support District needs. This relates to maintaining business continuity and reliable operations for the District owned and operated hydroelectric plants, transmission and distribution systems, water and waste water facilities, parks, fisheries, and broadband transport infrastructure servicing customers in the northwest. There are no other communication alternatives or options available that adequately meet our mission critical needs.

The heart of the issue, and the bases for our concern, relate to the introduction of potential and probable RF interference to our existing reliable and robust 6 GHz infrastructure. This generates a compromised communication environment, leading to performance issues and the possible loss of those services. We believe the genesis of this RF interference will be introduced at several different levels as it relates to the operations of a wireless system under this FCC proposal:

1. Diminished equipment performance and reduced RF interference protection/regulations associated with WISP equipment
 - a. Necessary to drive solution cost down to meet product wide-spread adoption
2. Abandonment of telecom operating best practices
 - a. Necessary to drive cost down to meet business ROI
3. Non-qualified workers
 - a. Skill set, training, and equipment in-line with WISP practices
4. Conflicting business models
 - a. Utilities invest in high-quality solutions with long life expectancies
 - b. WISP invests to meet ROI requirements, low-cost solutions

FCC's improvident perspective on how this proposal could potentially reduce our ability to deliver reliable, resilient and cost-effective radio transport services to our key critical services is disconcerting to Chelan County PUD. The former FCC Administration recognized the importance of having certain portions of the RF spectrum allocated to dedicated and specific use. Effective controls and requirements were implemented to ensure proper management for the intended use, with the current 6 GHz spectrum being one of them. In support, the industry as a whole responded by developing quality products and best practices with demanding expectations, which created a dependable, reliable, and stable environment that would support critical data and voice communications. Chelan County PUD strongly encourages the current FCC Administration to holistically and comprehensively consider the

potential impact this proposal could have on our ability to deliver reliable service to our customers, and to maintain our assets responsibility.

Sincerely,

Robert Shane
Director of Network Operations
Fiber & Telecom Systems Department
Chelan County PUD