



SUBMITTED ELECTRONICALLY VIA ECFS

Marlene H. Dortch, Secretary

Federal Communications Commission

445 Twelfth Street, S.W. Washington, DC 20554

Re: WT Docket No. 17-200

Traverse City Light & Power is filing comments on the economic benefits of a proposed 900 MHz broadband allocation, in response to the Wireless Telecommunications Bureau's request for comment related to FCC WT Docket No. 17-200. TCL&P is a Michigan based municipal electric company whose mission is to provide the Public Power benefits of safety, lower rates, high reliability, local control and exceptional customer service to over 12,700 in the Traverse City area. Our residential, commercial, and industrial customers enjoy reliable power at low rates because we are a community-owned, not-for-profit public power utility. Public Power is a collection of more than 2,000 community-owned electric utilities that serve over 40 million people or about 15% of the nation's electricity consumers. Public Power utilities are operated by local governments to provide communities with reliable, responsive electric service, and are directly accountable to the people they serve through local elected or appointed officials.

TCL&P prides itself on being a responsive and community-friendly electric utility. The core purpose of the utility is electric service, but has grown to provide traffic signals operation and maintenance, a complimentary downtown WiFi network, a dark fiber system and street lighting, all of which enhance the quality of life and make Traverse City a better place to live, work and play.

As Traverse City continues to expand and develop, the goal of attracting and retaining a talented community with access to innovation and technology is paramount. As part of this initiative, TCL&P has committed to investigating and implementing a lit fiber network, proving a low-cost solution that will help expand broadband connectivity throughout the community and utilize TCL&P's existing fiber network. The FCC's NOI on the realignment of the 896-901/935-940 MHz band seeks to ask if the creation of a private enterprise broadband allocation would be in the public interest of utilities and the communities they serve. As stated in the article *A Strong Traverse City*, "Successful cities aren't just committed to protecting past perceptions, but are able to adapt to a changing landscape."<sup>1</sup>

### **Need for Broadband and Technology Innovation**

As issued earlier this year in the TCL&P 2017 strategic plan<sup>2</sup>:

Technology plays a valuable role within all strategic areas and is at the forefront of the electric utility. In recent years, technical innovation has become a leading factor in modernizing the face of the electric utility by creating efficiencies

<sup>1</sup><https://astrongtraversecity.com/principles/economic-development/>

<sup>2</sup><http://www.tclp.org/Uploads/AboutTCLP/2017%20MASTER%20Strategic%20Plan.pdf>





within all aspects of the business. Therefore, it is necessary to embrace technology as a strategic issue. The areas focused on for this strategic issue include:

- Ensuring security for the integrity of the utility.
- Implementing energy efficiency technologies.
- Maximizing operational efficiencies.
- Enhancing communications.
- Keeping abreast of future technology opportunities.

The Operating Strategy for Technology is to:

**“Embrace technologies for the benefit of the customers and community.”**

Approval of the 900 MHz proposal will provide utilities like TCL&P with a viable option for both its operational needs, and the needs of its customers. While fiber has been a suitable solution in the past, being able to extend connectivity to the last mile in a cost-effective manner is optimal. As a small utility, leveraging the economies of scale that exist in the marketplace is very important to providing reliable service while remaining competitive. Smaller entities do not always benefit from the purchasing power of larger organizations, and therefore understand the need to work with standards based systems to benefit from global R&D efforts and an ecosystem. Larger entities can often dictate specifications for which manufacturers will readily comply and modify its products for, whereas, smaller entities do not have that same luxury. The 900 MHz realignment for broadband is therefore very attractive for smaller utilities to leverage scale, minimize vendor lock-in, and benefit from the diverse set of options that this band would offer.

As Ericsson’s<sup>3</sup> comments highlighted, the value of an ecosystem from 3GPP Band 8 to the GSM 900 band in Europe, Asia and elsewhere, and the interoperability across vendors and networks would allow utilities to simplify communications across the board. The comments from the Technical Manager at Western Farmers Electric Cooperative were also very valuable in highlighting the propagation characteristics that a 900 MHz wireless broadband solution would offer, thereby enabling a lower total cost of ownership to users of the band.<sup>4</sup>

We strongly urge the commission to reconfigure the 900 MHz band as proposed, which creates a flexible allocation, offering current narrowband users in the band the maintaining of their operations, while providing the opportunity to access a larger segment of the nation beyond what the current configuration enables. A broadband designation will allow utilities of all sizes to not only maintain, but enhance reliability. It would increase efficiencies, while promoting flexibility and provide the ability to leverage evolving technology, implement IoT securely, create smart cities and drive economic development, which are incredible benefits to the public overall

<sup>3</sup><https://ecfsapi.fcc.gov/file/1002016270022/900%20MHz%20NOI%20Comments%20FINAL.pdf>

<sup>4</sup>[https://ecfsapi.fcc.gov/file/10022612828908/NOI\\_PDV\\_17-200.pdf](https://ecfsapi.fcc.gov/file/10022612828908/NOI_PDV_17-200.pdf)





TRAVERSE CITY  
LIGHT & POWER

Investing Our Energy In You

Respectfully Submitted,

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Director of Technology

Traverse City Light and Power

