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TARRANT COUNTY WATER CONTROL AND IMPROVEMENT  
DISTRICT NUMBER ONE

JUN - 4 1992

800 East North Side Drive  
Fort Worth, Texas 76102-1097

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FILE

FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

FCC MAIL BRANCH

In the matter of:

Redeveloping of spectrum to  
encourage innovation in the  
use of new telecommunications  
technologies.

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ET Docket No. 92-9

To: **FEDERAL COMMUNICATIONS COMMISSION (FCC)**

Comments of **TARRANT COUNTY WATER CONTROL AND  
IMPROVEMENT DISTRICT NUMBER ONE**  
Fort Worth, Texas

I. INTRODUCTION

TARRANT COUNTY WATER CONTROL AND IMPROVEMENT DISTRICT  
NUMBER ONE is a Political Subdivision of the State of Texas and operates four  
(4) major water reservoirs which provide raw water to over thirty (30) cities and  
ten (10) counties in North Central Texas, with the largest users being Fort Worth,  
Arlington, Mansfield and the Trinity River Authority. The District has recently  
entered into contracts to provide water in Ellis County to the cities of

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Waxahachie and Ennis and the Super Conducting, Super Collider. The District also maintains more than twenty-six (26) miles of floodway to provide flood protection in and around the City of Fort Worth.

Over the past two years, the District has been designing a microwave system that will link all of its operational facilities located over a three hundred (300) mile area. The system has been specifically designed for the implementation of a Supervisory Control and Data Acquisition (SCADA) system that will allow the District to remotely monitor and operate its water supply pump stations and pipelines. The microwave system was designed around the 2.1 - 2.2 Ghz microwave equipment which was found to be far more cost effective than the higher frequencies. For systems such as ours which require 96 or fewer channels and face the budget constraints typical of government agencies, this system was determined to be the most cost effective for our water customers and taxpayers.

II. The District opposes the fact that the Commission adopted its changes on the 16th of January, with public notice being issued on the 7th of February.

The District believes that those of us who, at considerable expense and in good faith, have been planning and implementing a microwave project prior to January 16, 1992, should, with suitable documentary evidence submitted, have our license granted on a **primary basis**. In this case, subsequent to the appropriate tower and frequency research, the license applications were submitted on January 24 and granted in May on a secondary basis. While it is understood that the anti-speculative measures are important, we feel that there should be a process implemented to protect those who have projects in progress and can submit evidence to this effect.

III. The 1850 - 2200 MHz band SHOULD NOT be reallocated for the creation of a spectrum reserve.

TARRANT COUNTY WATER DISTRICT opposes a reallocation of spectrum in the 1850 - 2200 MHz band, specifically the frequencies between 2100 - 2200 MHz, for the creation of a spectrum reserved for development of emerging technologies. Neither the District, nor the cities to which we supply water, can afford for our system to be down at any time. The SCADA system which we are currently installing will monitor hundreds of points every second sending data over one hundred (100) miles. Therefore, if the District is instructed to vacate its frequencies, its communications link between facilities and the ability to monitor and efficiently operate its water supply system would be impaired, not to mention the emergency response time to help prevent public injury in the event of an emergency.

IV. Actions to be taken if 2 Ghz band is reallocated.

TARRANT COUNTY WATER DISTRICT urges the Commission to consider alternate bands, such as the 2500 - 2690 MHz "wireless cable" band, as a possible "home" for the spectrum reserve. The District objects to the requirement of having to abandon the 2 Ghz band for future systems. We have found that the narrow portion of the 2 Ghz band (2.1 - 2.2 Ghz) is without a doubt the most cost effective way to transport circuits, about one-half the cost of 6 Ghz. This is the most cost effective approach for government entities, including state and local governments, political subdivisions and municipalities.

V. The 1710 - 1850 MHz band should be made available for displaced 2 Ghz users.

TARRANT COUNTY WATER DISTRICT urges the FCC and the National Telecommunications and Information Administration (NTIA) to commence discussions to open the 1710 - 1850 MHz Federal government spectrum for use by displaced 2 Ghz users on a co-primary, non-interference basis. We have

currently looked at the cost of changing to such a frequency, if these frequencies were available to government entities, and found it to be affordable to the water customers and taxpayers.

VI. Conclusion

TARRANT COUNTY WATER DISTRICT opposes the use of the 2 Ghz band as a spectrum reserve. It seems to the District that a proven and efficient system of microwave communications should not be sacrificed for what may or may not happen in the future, especially in light of the substantial costs involved in relocating the existing 19858 facilities (FCC report OET/TS 91-1), the lack of a future microwave alternatives, and because many of us will not be able to afford systems at 6 Ghz or above. We feel that suitable spectrum in the 1.710 - 1.850 Ghz Government band or other bands slightly above 2.2 Ghz should be made available for us to relocate if the Commission mandates that we must move. Should this take place, the move can be accomplished at much less cost to all concerned and so that future narrow band systems will still be within the financial capabilities of users similar to this District.

Respectfully submitted,  
TARRANT COUNTY WATER CONTROL AND  
IMPROVEMENT DISTRICT NUMBER ONE

By: George N. Shannon  
George Shannon  
President, Board of Directors

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June 2, 1992