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May 24, 2019

Ms. Marlene H. Dortch Secretary

Federal Communications Commission Ex Parte 445 - 12th Street, S.W.

Washington, D.C. 20554

Re: Notice of Ex Parte Presentation, ET Docket No. 18-295, GN Docket No. 17-183.

Dear Ms. Dortch:

The Utilities Technology Council (“UTC”) is providing the following ex parte notification in the above-referenced proceeding in accordance with Section 1.1206 of the Commission’s Rules. On May 22, 2019, Christina Baworowsky from Alliant Energy, Ben Portis from Entergy, Brian O’Hara from the National Rural Electric Cooperative Association, Arpan Sura from Hogan Lovells (on behalf of the Association of American Railroads), and the undersigned from the Utilities Technology Council met with William Davenport in the Office of Commissioner Starks to discuss matters related to the above-referenced proceedings.

During the meeting, the parties provided the attached presentation and explained how utilities and other critical infrastructure industries operate extensive microwave communications systems in the 6 GHz band, which they use to support the safe, reliable and secure delivery of essential services. Owing to the criticality of these services, their microwave systems are designed, built, and maintained to operate at extremely high standards for reliability and low latency. Potential interference from unlicensed operations represents an unreasonable risk to the performance of these microwave systems in the 6 GHz band, and the parties explained that interference must be prevented rather than fixed after the fact. Specifically, the parties explained how both indoor and outdoor unlicensed operations pose an interference threat. In addition, the parties described various additional issues, including the need for enforcement mechanisms in the event that interference occurs, as well as the need to develop, test and certify automated frequency coordination (AFC) systems to meet performance and security requirements.

Thank you for your help in this matter. If there are any questions concerning this matter, please contact the undersigned.

Respectfully,



Brett Kilbourne

Cc: FCC Participants



**Potential Interference to Utility and CII 6 GHz Systems from Unlicensed Operations**

**May 22, 2019**

* Utilities and other critical infrastructure industries (CII) rely on the 6 GHz band for a variety of mission critical communications.
* The 6 GHz band is uniquely suited to support utility and CII communications needs and there is a lack of reasonable alternatives.
* Many utilities and CII relocated microwave systems to the 6 GHz band after the 2 GHz band was reallocated.
* Utilities and CII require ultra-high reliability and exceptionally low latency for these communications systems.
* Potential interference from unlicensed operations must be prevented from occurring.
* Remedying interference after the fact will not be sufficient.
* The probability of interference and the magnitude of the risk is unacceptably high
* Concerns:
  + Interference from outdoor operations
    - AFC is untested and lacks transparency to allow utilities and CII to mitigate and resolve interference that occurs.
    - AFC is predicated on modelling that may not account for real-world environment or actual microwave operations.
  + Interference from indoor operations
    - Overestimated attenuation
    - Uncontrolled operations
    - Unknown locations
    - Improper installation
* Remaining issues:
  + Enforcement mechanisms in the event of interference
  + Security concerns about AFC
  + Inaccuracies in underlying data
  + Centralized or decentralized AFC
  + Performance requirements for AFC
  + Independent testing and certification of AFC
  + Adjacent channel interference
  + Incremental deployment of unlicensed systems to limit the potential for interference

Discussion

