

NEBRASKA

Good Life. Great Water.

DEPT. OF NATURAL RESOURCES

May 31, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554



Pete Dicketts, Governor

Re: Comment on WT Docket No. 19-116
In the Matter of Allocation and Service Rules for the 1675-1680 MHz Band

Dear Secretary Dortch,

I am writing to you as Director of the Nebraska Department of Natural Resources (Department) to express my deep concern about the proposed allocation of the above-referenced radio bands for non-federal flexible wireless use. The Department depends on the Geostationary Orbiting Environmental Satellites (GOES) Data Collection System (DCS) to support critical statute-driven activities. The Department is concerned that powerful transmissions in bands adjacent to the relatively weak satellite download bands may compromise the ability of the GOES system to download information in a timely manner.

The Department uses the GOES satellite system to transmit information from over 200 stream and canal gauges. The Department uses real-time information from these gauges, as well as several dozen gauges operated by other organizations (including the U.S. Geological Survey and the Bureau of Reclamation) to make critical hour-by-hour water administration decisions. Our ability to accurately track available water in the state allows the Department to properly allocate water to the users with the highest priority, resulting in a strong economic impact on farmers, businesses and environmental interests across the state. In addition, our streamflow measurements are used by the National Weather Service and the Nebraska Emergency Management Agency to forecast and mitigate loss of life and property during flooding events. It is critical that these agencies have access to up-to-the-minute river stage and discharge values.

In summary, the Nebraska Department of Natural Resources is opposed to the allocation of the 1675-1680 MHz band for terrestrial mobile use. Any potential interference with operation of the GOES system threatens the economic security and public safety of Nebraska's citizens.

With best regards,

A handwritten signature in blue ink that reads "Gordon W. Fassett".

Gordon W. Fassett
Director

Gordon W. "Jeff" Fassett, P.E., Director

Department of Natural Resources

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