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June 3, 2019

Submitted via ECFS

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, District of Columbia 20554

RE: Review of the Commission's Rules Governing the 896-901/935-940 MHz Band, WT
Docket No. 17-200

Dear Ms. Dortch:

Alliant Energy Corporate Services, Inc., on behalf of its affiliated utilities Interstate Power and Light Company and Wisconsin Power and Light Company (collectively, Alliant Energy), hereby files its comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above-referenced proceeding.

Alliant Energy serves approximately 1.4 million electric and gas customers and employs approximately 4,000 people in Iowa and Wisconsin. Integral to providing its customers with safe, reliable, and affordable energy services, Alliant Energy has implemented Sensus Advanced Metering Infrastructure (AMI), which relies on Sensus's licensed band, specifically, the Narrowband PCS spectrum 901.125 MHz and 940.125 MHz pair. Alliant Energy's AMI system gives it the ability to automatically and remotely measure usage, connect and disconnect service, identify and isolate outages, receive certain alerts and alarms, and monitor voltage.

First, given Alliant Energy's reliance on critical infrastructure utilizing the spectrum adjacent to the 900 MHz band at issue in this rulemaking, it is extremely important that Alliant Energy's infrastructure experiences no harmful interference. As other parties such as the Utilities Technology Council have previously explained, this infrastructure must be reliable and resilient at all times, including during natural disasters, and any degradation of that functionality can place the public at great risk.¹ If the Commission allows realignment of the 900 MHz band, the Commission should refrain from adopting any changes to the band that would disrupt critical infrastructure communications in the adjacent spectrum, as that would plainly not serve the

¹ See, e.g., *Petition for Reconsideration or Clarification of Utilities Technology Council*, WT Docket No. 17-200 (filed October 15, 2018), at 5.

public interest. The Commission should also ensure that incumbents receive equal and complete protection from harmful interference regardless of whether they are located in the proposed broadband segment or in an adjacent narrowband segment. *See, e.g.*, NPRM, ¶¶ 73-74. Accordingly, Alliant Energy supports adjacent channel interference rules that are designed to reliably and completely protect against interference with Narrowband PCS operations.

Second, Alliant Energy supports the Commission's position that broadband licensees should be solely responsible for preventing harmful interference to narrowband operations. *See* NPRM, ¶ 73. Alliant Energy also supports the Commission's position that the broadband licensee be responsible for "resolving" any such interference; however, Alliant Energy requests that the Commission clarify the rule to ensure that the broadband licensee bears sole responsibility for fully remediating any interference, including making whole those incumbents whose critical operations are impacted. Given that even brief interference with this critical infrastructure can have significant consequences, the Commission should also further clarify its proposal that any interference be resolved by the broadband licensee "in the shortest time practicable" by establishing specific and enforceable time periods and standards for remediation to which the offending broadband licensee can quickly and publicly be held accountable. The broadband proponent in these proceedings should also be required to conduct real-world testing to understand and document potential impacts to neighboring incumbents. The broadband proponent should also be required to publicly disclose the results of that testing so the true potential and scope of those effects can further assist the Commission in calibrating its interference protection proposals to ensure any such interference is immediately and effectively addressed.

Finally, Alliant Energy also holds a license in the proposed broadband segment that it uses to operate a radio system at one of its largest generating stations in Wisconsin, which would be impacted by the reallocation of the 900 MHz band. If the Commission allows realignment of the band, Alliant Energy supports the Commission's market-driven voluntary exchange process proposal, rather than any mandatory process. NPRM, ¶ 39.

Alliant Energy appreciates the opportunity to participate in this important rulemaking.

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "Lissa Koop".

Lissa Koop
Senior Attorney
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