



Amanda Fritz, Commissioner
Michael Stuhr, P.E., Administrator
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June 17, 2019

Marlene H. Dortch
Commission's Secretary, Office of the Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Portland Water Bureau
1120 SW 5th Ave, Room 600
Portland, OR 97204

Dear Ms. Dortch:

The City of Portland Water Bureau ("Bureau") is writing to submit comments on WT Docket No. 19-116, the FCC's proposal to reallocate the 1675-1680 MHz band for shared use between incumbent federal operations and new, non-federal flexible wireless (fixed or mobile) use operations. The Bureau opposes the changes proposed in the Allocation and Service Rules for the 1675-1680 MHz Band Notice of Proposed Rulemaking and Order - GN Docket No. 19-116 (NPRM). Wider bandwidth utilization puts at risk the data fidelity of the GOES data that is critical to compliance with drinking water, environmental, and hydropower regulations as well as the operation of the primary drinking water system for the City of Portland, Oregon. The NPRM language stating that this reallocation of bandwidth will occur "without significantly affecting incumbent users" is unacceptably vague, and the Portland Water Bureau disagrees that there would be no significant impact.

The Bureau jointly funds 13 stream and reservoir monitoring stations with the U.S. Geological Survey (USGS) in and downstream of the Bull Run watershed, which serves as the primary drinking water source for one million Oregonians. Data for these stations are needed in real time to make critical decisions in operating the drinking water infrastructure that includes three dams, a treatment facility, and water transmission conduits. Examples of the reliance on the hydrologic data from these USGS stations include, but are not limited to, the following:

- Streamflow increases during storms show impending risk of turbidity levels above the Safe Drinking Water Act limits;

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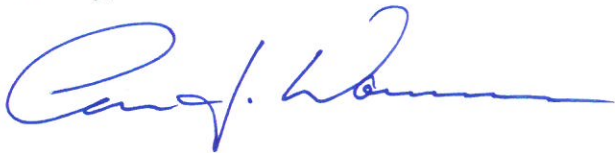
- Instantaneous streamflow response to storms triggers tributary sampling for *Cryptosporidium*, a component of compliance with Oregon Health Authority requirements;
- Water level and flow readings at the most remote dam site determine if water releases meet the terms of an easement with the U.S. Forest Service and a 401 Certification permit from the Oregon Department of Environmental Quality;
- Streamflow data downstream of all dams determine compliance with Federal Energy Regulatory Commission regulations for flow control;
- Temperature and streamflow data downstream of dams are integral for fine-scale dam release management conducted to comply with requirements of federal laws, including the Endangered Species Act and Clean Water Act.

Data at these USGS stations are collected by automated equipment in the field and transmitted to a GOES satellite at an hourly interval, at which time data are available on the web. The USGS data are then downloaded by the Bureau into an internal database, which in turn is used to send notifications and to populate operational models. Receiving accurate data at this short time interval is fundamental to effectively and safely operate the drinking water infrastructure and comply with multiple regulations.

The NPRM states, "Our proposed reallocation has the potential to spur innovation and investment in new wireless technologies, and we seek to do so without significantly affecting incumbent users." Despite the stated objective that any new, nonfederal fixed or mobile operations be required to protect incumbent federal operations from harmful interference, wider bandwidth utilization inherently puts GOES data fidelity at risk. Any (1) decrease in data quality, (2) increased time of data transmission, and (3) decrease in data security, would be both significant and harmful, compromising the basic goals of serving safe drinking water and meeting all federal and state regulations.

Thank you for receiving our comments.

Sincerely,



Chris Wanner

Director of Operations, Portland Water Bureau