



June 20, 2016

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

Re: Proceeding RM-11681, "Comment Sought To Update The Record On Ligado's Request That The Commission Initiate A Rulemaking To Allocate The 1675-1680 MHz Band For Terrestrial Mobile Use Shared With Federal Use"

Dear Mrs. Dortch:

The International Association of Emergency Managers (IAEM), an association representing more than 6,000 emergency management professionals in the public, private, and academic sectors, is deeply concerned that the FCC has chosen to seemingly ignore the concerns raised by our weather and water partner communities to "share" the 1675-1680 MHz band between a potential commercial terrestrial broadband provider (Ligado) and the National Oceanographic and Atmospheric Administration (NOAA). The American Meteorological Society (AMS), the National Weather Association, the National Hydrologic Warning Council, and the Lake Carriers' Association have very effectively articulated the concerns and potential impact of "shared use" of the spectrum used by NOAA weather satellites and the terrestrial sites that receive the data provided. Rarely does a month go by without one or more regions of our country suffering the effects of severe weather resulting in millions to billions of dollars in property damage and unfortunately, death and injury to our citizens. "In 2015, there were 10 weather and climate disaster events with losses exceeding \$1 billion each across the United States. These events included a drought event, 2 flooding events, 5 severe storm events, a wildfire event, and a winter storm event. Overall, these events resulted in the deaths of 155 people and had significant economic effects on the areas impacted."¹ Just this past month, floods have resulted in disaster declarations in thirty-one counties

¹NOAA National Centers for Environmental Information - Billion-Dollar Weather and Climate Disasters: Overview
(<https://www.ncdc.noaa.gov/billions/>)

in Texas. As the event is still in progress as this letter is written, damage estimates have yet to be determined however local authorities have reported six deaths as a direct result of the flooding.

IAEM members depend on reliable, accurate and direct, timely data as a basis for emergency management decisions related to floods and flash floods, water management, severe thunderstorms, tornados, wildland fires and hurricanes. Our members depend on the data to provide real-time information so we in turn can offer accurate and timely public warning and preparation instructions. The data is even used to assist with the safe movement of commercial shipping in our local ports and rivers that are located within our member's jurisdictions. Anything less than live, real-time, un-interrupted information transmitted via the current GOES and GOES-R satellites and received by ground reception sites operated by our members in all areas of our country is unacceptable and threatens important public safety activities.

We, in the emergency management community, believe sharing the spectrum will lead to missed warnings and directly threaten and interfere with our life saving mission across the country. As most of our members represent non-Federal entities, primarily local, county and state organizations, we will not be included in the "exclusion zones" promoted by Ligado. We understand that NOAA is already moving out of specific bands as a result of the first auction that impacted the agency's radiosondes, and has re-designed the new geostationary satellites (GOES-R, S, and T) to use the 1675-1695 MHz band, which was to remain available solely for NOAA use. We are puzzled why the 1675-1680 MHz band is now being reconsidered for "shared use" with a for-profit entity at the risk of public safety.

While the public notice updating Ligado's request states their testing results show there will be no interference, we respectfully request that no action be taken to "share" the spectrum until further studies and testing by or on behalf of the Federal Government (not an entity paid by Ligado) is planned, completed, and the results analyzed to ensure Ligado's use of this spectrum will not interfere with our public safety mission.

We are very concerned that this proposal does not allow for "protection zones" from interference outside of federal facilities. This disregards the crucial function that local, county and state emergency managers play in decision making around weather-related hazards, and the crucial importance this real-time information via GOES broadcast plays in that decision making.

As noted in a House Science, Space and Technology Committee NOAA budget hearing on March 16, 2016 by Rep. James Bridenstine, and at an AMS-AGU sponsored public event held in the Senate on May 25, 2016², troubling interference in this area has recently been confirmed from an adjacent band that disrupted downlinks from current GOES satellites. This indicates to IAEM that the research on interference conducted by Ligado was not reliable or comprehensive. IAEM, on behalf of our members, respectfully requests the FCC take into consideration the non-Federal agency use of the data from NOAA's satellites which would not be protected under Ligado's proposal. We are concerned that the FCC is moving too fast to auction a crucial portion of valuable spectrum – a move we believe is proceeding unprecedentedly quickly.

² <http://bit.ly/PaeseSpectrumAMS>

While Ligado's filings have stated that non-federal entities can obtain NOAA satellite information from other resources via the Internet, emergency managers across the country have come to depend on the Emergency Management Weather Information Network (EMWIN) to receive weather and satellite information which includes watches and warnings. This information is transmitted via the GOES satellites and can be received at county and local emergency operations centers across the country instantaneously without the use of Internet service which, in our experience, is typically the first utility to be lost during severe weather. In many parts of our country, where Internet access is still unreliable, EMWIN remains the only timely, reliable and effective method of receiving this important weather and water related information. We believe that the local receipt of the satellite data, by our members who serve in non-Federal entities across our continent, and therefore not "protected" under Ligado's proposal, will be adversely impacted by interference from the strong signal emitted by Ligado's proposed terrestrial wireless stations. This is simply unacceptable.

IAEM is very concerned that if the decision is made for this band to be auctioned as "shared use," there will be no going back, no way to "un-share" the spectrum and no accountability when interference does occur. NOAA will be held responsible for not being able to provide the information or any "missed" information, when it is the FCC Chairman, who is contemplating making this decision against the advice of a substantial portion of the weather, water enterprise, and emergency management communities. We do not believe moving forward with the "auction" of this specific 1675-1680 MHz band of spectrum is worth the risk of placing the protection of lives and livelihoods in jeopardy.

Thank you for the opportunity to express our concerns on behalf of the nation's emergency managers and the millions of citizens we serve.

Sincerely,

A handwritten signature in black ink, appearing to read "Robie Robinson", with a stylized flourish at the end.

Robie Robinson, President
U.S. Council of the International Association of Emergency Managers