



June 21, 2016

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

RE: Letter in response to RM-11681 Petition for Rulemaking: Ligado's Request to Allocate the 1675-1680 MHz band for Terrestrial Mobile Use Shared With Federal Use

Dear Ms. Dortch:

I represent the City of Bellevue Utilities Department which provides water, wastewater and storm drainage services to the city of Bellevue, Washington, a community of 130,000. The Utilities Department serves as the first responder for flooding emergencies in the city.

Bellevue Utilities Department has significant concerns regarding the Federal Communication Commission's plan to share the 1675-1680 Megahertz radio spectrum between a proposed terrestrial broadband wireless provider venture and long-established government meteorological and hydrological data providers. We oppose this action unless adequate protection zones are provided for the USGS GOES telemetry system. The GOES telemetry system measures via satellite transmission real time stream flows at Mercer Creek and water surface elevations on Lake Sammamish in Bellevue, Washington. The discharge data is used to determine which roads in Bellevue will flood during storm events. The Lake Sammamish water surface elevations provide information that can help us predict when homes will be flooded. Such protection is crucial to avoid the disruption of vital information used to ensure the nation's economic health, national safety, and security interests are safeguarded.

Bellevue has been a cooperating partner with the USGS for over 30 years co-funding a GOES telemetry gauge at Mercer Creek (No. 12120000) in Bellevue and a GOES lake gauge on Lake Sammamish (No. 12122000). Bellevue uses the near real time data from these gauges for conducting hydrologic analyses when heavy rainfall is predicted. This analysis assists us in planning for emergency response actions, such as deploying storm crews to close roads or placing sand bags to protect private and public properties and welfare of our citizens. If the telemetry data was interrupted during a flooding event it would impact our ability to determine when our emergency response should commence and significantly reduce or eliminate the lead time we need to react to large climatic events.

Without reliable signal transmission and reception to and from the GOES Data Collection System, the USGS hydrological data collection and distribution system would not function reliably to provide this essential information. Anything less than near real-time information transmitted via the GOES and GOES-R satellites using this spectrum will threaten these important public safety activities.

We thank you for considering our input.

Sincerely,

A handwritten signature in blue ink that reads "Paul A. Bucich".

Paul A. Bucich, P.E.
Assistant Director Engineering Division
Bellevue Utilities Department

City of
Bellevue



Post Office Box 90012 • Bellevue, Washington • 98009 9012

CC:

The Honorable Patty Murray
The Honorable Maria Cantwell
The Honorable Adam Smith
The Honorable Susan DelBene

The Honorable Lawrence E. Strickling, Assistant Secretary for Communications and Information and
NTIA Administrator, Department of Commerce

The Honorable Dr. Kathryn D. Sullivan, Under Secretary of Commerce for Oceans and Atmosphere and
NOAA Administrator

Director Suzette Kimball, United States Geological Survey
Commissioner Estevan López, U.S. Bureau of Reclamation