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July 2, 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 reply comments in response to the Commission's Notice of Proposed Rulemaking (NPRM) in the above-referenced proceeding.

The filed NPRM Comments firmly support Alliant Energy's position that any band realignment must fully protect critical infrastructure industries in adjacent NPCS spectrum from likely interference.¹ As Alliant Energy explained in its own Comments, it relies on critical infrastructure utilizing the spectrum adjacent to the 900 MHz band to serve approximately 1.4 million electric and gas customers. Alliant Energy uses the spectrum to monitor and support its services, including to automatically and remotely measure usage, connect and disconnect service, and identify and isolate outages and monitor voltage. During times of natural disasters, such communication is vital to help restore service to our customers in a safe and time effective manner, and to maintain the safety of our employees. That infrastructure must be reliable and free of harmful interference at all times in order to minimize risks to the public and maximize the public interest. Many similarly situated utilities and related companies, which collectively provide critical services to tens of millions more customers spread across the country, have submitted similar comments regarding the necessity of ensuring the integrity of adjacent NPCS systems. Notably, realignment proponent pdvWireless, Inc. ("PDV") has already agreed that

¹ See, e.g., Duke Energy Comments, at 7; Sensus Comments, at 4-8; NextEra Energy Comments, at 19; FirstEnergy Corp. Comments, at 3-4, Lower Colorado River Authority Comments, at 20-23; Critical Infrastructure Coalition Comments, at 7-8; Utilities Technology Council Comments, at 7-8.

incumbent operations must be protected, and that narrowband operations should “remain fully viable and protected.”² Given this broad consensus, Alliant Energy again urges the Commission to take affirmative steps to ensure that adjacent NPCS operations are fully protected from harmful interference.

As part of that interference protection, it is vitally important that the Commission formalize its position that broadband licensees should be solely responsible for preventing harmful interference to narrowband operations. *See* NPRM, ¶ 73. As Sensus explained, while PDV has entered into a contract with Sensus that may help them work through interference issues between broadband operations in the 900 MHz band and adjacent NPCS operations, other parties besides PDV will likely obtain broadband PCS licenses.³ The Commission should not entrust a matter of such significant public safety importance solely to piecemeal private contracts, however well-intentioned those individual agreements may be. Instead, the Commission should affirmatively require that the broadband licensees be responsible not only for “resolving” interference, but for fully remediating that interference quickly and at their expense.⁴ Providing this regulatory backstop will be an important public interest safeguard to ensure future 900 MHz band licensees maintain a consistent approach to interference protection and mitigation.

In addition, Alliant Energy respectfully repeats its request that the broadband proponent, and any other future 900 MHz band broadband operators in these proceedings, be required to conduct real-world testing to understand and document potential impacts to neighboring incumbents, the results of which should be publicly disclosed. Other commenters have agreed that this testing will ensure that current assumptions regarding interference protections are in fact borne out in practice, as well as provide a critical opportunity to correct any unexpected problems or risks to incumbent operations.⁵ Requiring prospective broadband operators and proponents to establish, through testing and analysis, that adjacent NPCS operations will in fact be fully protected from harmful interference can only benefit all parties by providing reassurances to incumbents and new licensees that their respective investments and operations will not be at risk.

Alliant Energy also reiterates its support for the Commission’s market-driven voluntary exchange process proposal, rather than any mandatory process. NPRM, ¶ 39. As other commenters have noted, adding mandatory requirements cannot be reconciled with the concept of a voluntary process.⁶ Certain commenters argued that any theoretical “holdouts” from a voluntary process should then be subject to mandatory mechanisms, such as those based on a “success threshold.”⁷ In actuality, adding such mandatory aspects to a voluntary process would improperly distort the core market-driven aspect of the voluntary exchange process by forcing incumbents to accept less favorable terms by broadband operators who are prepared to label them as “holdouts” if those terms are not accepted. The mandatory “success threshold” proposal

² *See* PDV Comments, at iv & 19.

³ Sensus Comments, at 6.

⁴ *See, e.g.*, Sensus Comments, at 5.

⁵ *Id.*, at 7-8.

⁶ *See, e.g.*, Critical Infrastructure Coalition Comments, at 6.

⁷ *See* PDV Comments, at iv & 14-17; Enterprise Wireless Alliance Comments, at 7.

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is at best a solution in search of a problem, and at worst a goad that will be used by broadband operators to force below market terms on incumbents. The Commission should reject that proposal and trust in the integrity of a completely voluntary exchange process to deliver true market driven results.

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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