

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Review of the Commission's Rules)	
Governing the 896-901/935-940 MHz Band)	WT Docket No. 17-200
Leasing of Spectrum)	

To: The Commission

**REPLY COMMENTS OF
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

The National Rural Electric Cooperative Association ("NRECA") hereby submits its Reply Comments in response to the Commission's Notice of Proposed Rulemaking exploring potential rule changes to facilitate the development of broadband technologies and services in the 896-901/935-940 MHz Band ("900 MHz Band").¹ NRECA generally supports the creation of a 900 MHz broadband service as proposed in the NPRM, as long as narrowband users are protected from interference and fully compensated by any band realignment.

I. BACKGROUND

NRECA is the national service organization for more than 900 not-for-profit rural electric cooperatives that provide electric energy to approximately 42 million people in 47 states -- approximately 12 percent of all U.S. electric customers. Rural electric cooperatives serve 88% of U.S. counties, including 327 of the Nation's 353 "persistent poverty counties.

Rural electric cooperatives were formed to provide safe, reliable electric service to their member-owners at the lowest reasonable cost. Rural electric cooperatives are dedicated to

¹ Review of the Commission's Rules Governing the 896-901/935-940 MHz Band, *Notice of Proposed Rulemaking*, WT Docket No. 17-200, FCC 19-18 (Rel. Mar. 14, 2019)("NPRM").

improving the communities in which they serve; management and staff of rural electric cooperatives are active in rural economic development efforts. Electric cooperatives are private, not-for-profit entities that are owned and governed by the members to whom they deliver electricity. Electric cooperatives are democratically governed and operate according to the seven Cooperative Principles.²

II. COMMENTS

As the Commission is aware, there is a shortage of broadband spectrum available for use by the Critical Infrastructure Industry (“CII”), particularly for higher speed point-to-multipoint data applications. That shortage is particularly acute in the rural areas served by NRECA’s members.³ Broadband spectrum is necessary to support deployment of smart grid technologies in rural areas, such as digital supervisory control and data acquisition systems (“SCADA”) to remotely monitor and control substation and field devices, teleprotection to guard against potentially hazardous faults, distribution automation to intelligently route power through the grid, metering, video, security, and other applications. Wireless communications are critical to the safe, reliable, and effective electric services NRECA’s members provide to rural America.

The 900 MHz band is lightly used in much of rural America. That being the case, NRECA generally supports the Commission’s proposal to designate the 897.5-900.5/936.5-939.5 portion of the 900 MHz band for broadband use in rural areas by critical infrastructure.”⁴

NRECA agrees with those comments in this proceeding that suggest realignment of the band will

² The seven Cooperative Principles are: Voluntary and Open Membership, Democratic Member Control, Members’ Economic Participation, Autonomy and Independence, Education, Training and Information, Cooperation Among Cooperatives, and Concern for Community.

³ These areas often are not covered by commercial broadband services. In addition, commercial broadband services are not suitable for many mission-critical electric utility applications.

⁴ NPRM at 2.

promote utility access to broadband spectrum. NRECA acknowledges that a 3x3 MHz broadband allocation cannot provide sufficient capacity to address all of the spectrum requirements of rural electric cooperatives deploying smart grid technologies. However, it would be a beneficial tool to NRECA's members and licensed, exclusive spectrum allocations suitable for LTE do not otherwise realistically exist for rural utilities. Thus, NRECA believes the Commission's proposal will serve the public interest.

Because several NRECA members operate narrowband systems in the 900 MHz band, NRECA also supports those commenters that call for incumbent narrowband users to be provided with comparable facilities, reimbursed for relocation costs that result from any band realignment, and protected from interference from the broadband segment.⁵ NRECA believes that the market-based, voluntary exchange process proposed by the Commission strikes an appropriate balance between promoting realignment of the band and protecting incumbent systems. Because the heaviest use of the 900 MHz band is in urban and suburban counties, NRECA believes that many rural areas will be available for deployment of the 900 MHz broadband allocation with little or no incumbent relocations required. The 900 MHz broadband licensee will be able to deploy to such rural markets shortly after the Commission adopts a 900 MHz broadband segment, while voluntary relocation of larger systems is ongoing.

III. CONCLUSION

NRECA supports the Commission's proposal to realign the 900 MHz band to adopt a 3x3 MHz broadband allocation. Narrowband users must be compensated for relocations and protected from interference from the broadband licensee. NRECA believes this is achievable in

⁵ See e.g., UTC Comments at 27.

rural America through the voluntary relocation process proposed by the FCC. The allocation will be a useful tool for rural electric cooperatives. NRECA looks forward to working further with the Commission on this matter.

Respectfully submitted,
National Rural Electric Cooperative Association

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