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August 10, 2020

Ms. Marlene H. Dortch Secretary  
Federal Communications Commission  
445 - 12th Street, S.W.  
Washington, D.C. 20554

Re: AURA Network System OpCo, LLC and A2G Communications, LLC Request for Waiver, WT Docket No. 20-185

Dear Ms. Dortch:

The Utilities Technology Council (UTC) hereby submits this letter in support of the Request for Waiver of 450 MHz General Aviation Air-Ground Radiotelephone Service (450 MHz AGRAS) Rules to Permit Service to Unmanned Aircraft Systems (UAS)” (Waiver Request) filed by AURA Network Systems OpCo, LLC (AURA) and A2G Communications, LLC (A2G).<sup>1</sup>

As Aura has shown, a waiver of Section 22.805 is warranted here to support command and control and non-payload communications (“CNPC”) at low altitudes and cost-effective nationwide coverage for low-altitude, Beyond Visual Line of Sight (“BVLOS”) for unmanned aerial systems (UAS). This would serve the public interest, because it would promote the ability of utilities and other critical infrastructure industries to use UAS to inspect utility assets and ensure they are repaired or replaced prior to failure. As EEI explained in its comments, this would allow utilities to both increase safety for workers and the public by conducting unmanned inspections and reduce costs because UAS would be able to quickly and affordably access and inspect remote transmission networks and other part of the energy grid.<sup>2</sup>

In addition, Aura has shown unique circumstances and lack of reasonable alternatives, because the 450 MHz AGRAS channels offer the opportunity to use this spectrum to provide data communications for UAS, thereby putting this spectrum to effective use

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<sup>1</sup> AURA Network Systems OpCo, LLC and A2G Communications, LLC Request for Waiver, WT Docket No. 20-185 (filed June 12, 2020) (AURA Petition). *See also* Wireless Telecommunications Bureau Seeks Comment on Request for Waiver of 450 MHz General Aviation Air-Ground Radiotelephone Service Rules to Permit Service to Unmanned Aircraft Systems, *Public Notice*, DA 20-659 (rel. June 24, 2020).

<sup>2</sup> Comments of the Edison Electric Institute in WT Docket No. 20-185 at 5 (filed July 24, 2020).

without causing interference to other aviation communications services.<sup>3</sup> Moreover, as EEI explains, using the 450 MHz AGRAS channels provides utilities with the added advantage of access to reliable, interference free and secure communications on a specialized, private carrier and on a nationwide basis.<sup>4</sup>

Finally, Aura has shown that a waiver of Section 22.809 should be granted to permit ground station transmitters to operate at less than 50 watts and airborne mobile transmitters to operate at less than 4 watts.<sup>5</sup> UTC agrees with Aura that the power limits in Section 22.809 unnecessarily require higher power operations that would limit the number of subscribers that can be served by the system and would prevent the network from achieving the full benefits of the digital technology installed as part of the new network build out.<sup>6</sup>

Therefore, UTC supports Aura's Petition and urges the Commission to grant a waiver of Section 22.805 in order to provide utilities with UAS BVLOS communications capabilities.

Sincerely,

**Utilities Technology Council**

*/s/ Brett Kilbourne* \_\_\_\_\_

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<sup>3</sup> Aura Petition at 5. *See also* Section 1.925 of the Commission's Rules, permitting a waiver of the Commission's rules where it is shown that "(i) [t]he underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest; or (ii) [i]n view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative."

<sup>4</sup> EEI Comments at 5.

<sup>5</sup> Aura Petition at 21.

<sup>6</sup> *Id.*