



WASHINGTON, DC

Kevin M. Cookler
202.416.6749
kcookler@lermansenter.com

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VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: Notice of *Ex Parte* Presentation; WT Docket No. 17-200

Dear Ms. Dortch:

On August 15, 2019, Jason Ervin, Senior Director Telecommunications, and Raul Garcia, Legal Counsel, of Lower Colorado River Authority (“LCRA”), along with undersigned counsel and Michele Farquhar of Hogan Lovells met with Roger Noel, Scot Stone, Lloyd Coward, and Stana Kimball of the Wireless Telecommunications Bureau, Mobility Division, to discuss the above-referenced proceeding.

LCRA discussed that it generally does not support a realignment of the 900 MHz band because LCRA’s existing 900 MHz narrowband system would not fit within the proposed 2/2 MHz narrowband allocation and would suffer harmful interference if forced to relocate to the new narrowband segments. If the Commission proceeds with realignment of the 900 MHz band, LCRA indicated that it supports only a truly voluntary process.

In the event the Commission adopts a mandatory relocation mechanism, LCRA reiterated that the Commission should exclude “complex” narrowband systems from any mandatory relocation obligation. LCRA noted that there is strong support in the record, including from proponents of realignment, for adopting an exclusion for complex narrowband systems.

Consistent with its comments and reply comments, LCRA urged the Commission to adopt a definition for complex systems that includes (1) any system with 25 or more integrated 900 MHz sites; (2) any system that is shared by the incumbent licensee with public safety users pursuant to Section 90.179 of the Commission’s rules; and (3) any system that is authorized for an extended implementation period pursuant to Section 90.629 of the Commission’s rules. LCRA noted that many commenters supported LCRA’s position that the Commission should revise the threshold to 25 sites and consider other factors for defining a complex system. LCRA expressed concern that

if the threshold for defining a complex system is set at an artificially high number, it would eventually lead to reduced vendor support and lack of equipment availability that would cause harm to a large number of utility customers and ratepayers because of the significant costs and other hardships imposed on the few remaining large incumbents.

In areas with a complex system licensee that is excluded from realignment, LCRA urged that the Commission should not issue a broadband license without the voluntary agreement by the complex system licensee. LCRA expressed support for lifting the 900 MHz application freeze so that incumbent complex system licensees can expand their systems to meet future needs. LCRA recommended that the Commission adopt interference protection levels similar to the protection levels afforded to 800 MHz band systems. LCRA also discussed the importance of testing and other measures, such as frequency coordination and notification requirements, to ensure that prospective broadband licensees do not interfere with narrowband systems.

Finally, LCRA explained that it will incur significant costs under any realignment process. Because of the increase in the noise floor due to the introduction of a broadband system in the 900 MHz band, LCRA will have costs associated with deploying and operating additional sites and 900 MHz channels to ensure that LCRA can continue to operate at its current reliability levels and within the same contour as its existing system. LCRA should be fully reimbursed for all of these costs it incurs under any realignment process.

In accordance with the Commission's rules, one copy of this *ex parte* notice is being filed electronically for inclusion in the record of this proceeding.

Respectfully submitted,

Lower Colorado River Authority

/s/ Kevin M. Cookler

Kevin M. Cookler

Lerman Senter PLLC

Counsel to Lower Colorado River Authority

cc: Roger Noel
Scot Stone
Lloyd Coward
Stana Kimball