



Edison Electric
INSTITUTE

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September 6, 2017

Mr. Donald Stockdale
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: FELHC, Inc. *et al.* Request for Extension or Waiver of 700 MHz Guard Band
Performance Requirement
WT Docket No. 17-201

Dear Mr. Stockdale:

The Edison Electric Institute (“EEI”) submits this letter in support of the Request for Waiver and Extension of Substantial Service Requirement for Upper 700 MHz A Block Licenses (“Waiver and Extension Request”) filed by FELHC, Inc., a license-holding affiliate of FirstEnergy, BPC Spectrum LLC, Dominion 700, Inc., and Access 700, LLC (“FirstEnergy”).

EEI is the trade association that represents all U.S. investor-owned electric companies. Our members provide electricity for 220 million Americans, and operate in all 50 states and the District of Columbia. As a whole, the electric power industry supports more than 7 million jobs in communities across the United States. In addition to our U.S. members, EEI has more than 60 international electric companies, with operations in more than 90 countries, as International Members, and hundreds of industry suppliers and related organizations as Associate Members. Organized in 1933, EEI provides public policy leadership, strategic business intelligence, and essential conferences and forums.

EEI understands FirstEnergy proposes to use the upper 700 MHz A block to deploy a private utility communications network for monitoring and control of electrical equipment across FirstEnergy’s service territories. The network will promote security, reliability, and efficiency of the electric grid. The deployment is being made in response to plans by commercial carriers to retire copper line service as part of the IP transition. EEI commends FirstEnergy’s proactive approach to addressing the IP transition and urges the Commission to grant the Waiver and Extension Request.

As EEI previously has stated to the Commission, the IP transition poses unique challenges for electric utilities. Electric utilities are among the nation’s largest users of communications networks and services. As the IP transition moves forward and copper loops rapidly are retired, electric utilities are charged with finding replacement communications options that meet the heightened standards required of Critical Infrastructure Industry (“CII”) entities.

The Waiver and Extension Request aptly highlight many of these issues. As commercial providers retire copper-based services, electric utilities often find that replacement options are not available, particularly in rural and remote areas. Even when options may be available, the level of required redundancy or reliability may not be present. FirstEnergy should be commended for investing in infrastructure improvements to meet its required levels of reliability, resilience, and efficiency.

As FirstEnergy notes, there are very few options available to utilities seeking to deploy a wide-area licensed communications network. FirstEnergy states it selected the upper 700 MHz A block because it determined it to be a unique option that can be leveraged to serve thousands of devices across FirstEnergy's 67,000 square mile service territory. Due to the considerable scope of the project, FirstEnergy anticipates that deployment will not be completed by the June 13, 2019, substantial service deadline for the licenses. However, if the deadline is extended as requested, by the end of 2022, FirstEnergy estimates that 8.9 million people will benefit from its 700 MHz band deployment, clearly meeting the substantial service requirements.

Reliable communications networks are critical to the operations of electric utilities and, in turn, the quality of electric service the public receives. FirstEnergy proactively is addressing the retirement of commercial copper-networks by undertaking the deployment of a private communications network. It clearly is in the public interest to allow FirstEnergy the time necessary to complete its upper 700 MHz A block deployment. The Commission should make accommodations in the upper 700 MHz A block substantial service deadline, which was set many years ago without consideration of the IP transition. Therefore, EEI strongly supports a grant of the Waiver and Extension Request.

We look forward to continuing to work with the Commission as electric utilities navigate the IP transition. Please contact the undersigned with any questions.

Respectfully submitted,

EDISON ELECTRIC INSTITUTE

/s/ Phillip Moeller

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