



CITY OF NEWPORT
DEPARTMENT OF CIVIC INVESTMENT

September 8, 2017

VIA ELECTRONIC DELIVERY

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Notice of Inquiry
WT Docket No. 17-200**

Dear Ms. Dortch:

The City of Newport, RI has worked for many years with critical infrastructure and energy-related companies on matters related to the efficient and reliable operation of their communications facilities. We urge the FCC to create a 900 MHz broadband allocation that will enable utilities and other providers of critical services to deploy modern, secure, and resilient networks, ones capable of supporting Smart Grid and other critical functionalities that also are able to repel cyber attempts to compromise or even destroy their operations.

Modernization of the nation's energy grid is one of the most challenging issues of our time and will require updating the communications networks that are essential to its operation. Many of the wireless systems deployed today rely on technology developed well before broadband technology was an option and before cyber security became a serious threat. A 900 MHz (896-901/935-940 MHz) private carrier broadband network focused on the needs of utilities, other public service organizations, and business enterprise entities could be expected to produce the following public interest benefits:

- Migration from vulnerable narrowband systems to broadband technology capable of supporting advanced, secure Smart Grid operations.
- Establishment of a cost-effective below-1 GHz broadband network with a virtuous circle of hardware, device, and application investment and development.
- Ability of utilities and other energy-related companies to define their own operating parameters, including reliability, redundancy and coverage, as well as their preferred financing and control arrangements.
- Opportunity for energy experts in sector-specific working groups to develop and test additional energy-focused applications and scenarios prior to deployment, including those designed specifically to thwart cyberattacks on grid resources.
- Assumption by the U.S. of a pre-eminent role in leveraging this widely deployed band to address energy-specific needs.

We urge the FCC to proceed expeditiously in adopting rules that provide for the creation of a 900 MHz broadband option.

City of Newport, RI

Paul J. Carroll
Director Civic Investment