

November 18, 2019

VIA ECFS

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

Re: **Request for Waiver of the Citizens Broadband Radio Service Transition Deadline
WT Docket No. 18-353**

Written *Ex Parte* Communication

Dear Ms. Dortch:

San Diego Gas & Electric Company (“SDG&E”), through counsel, submits this *ex parte* letter to strongly support the Petition for Waiver jointly filed by the Wireless Internet Service Providers Association (“WISPA”) and the Utilities Technology Council (“UTC”) requesting an extension of the April 17, 2020 deadline by which existing Part 90 3650-3700 MHz Service licensees are required to complete the transition of their operations to comply with the Part 96 Citizens Broadband Radio Service (“CBRS”) rules (the “Blanket Waiver”).¹ Grant of the Blanket Waiver would allow SDG&E and other 3650-3700 MHz licensees to more safely and efficiently transition their networks to comply with the CBRS rules. As described herein, extension of the transition deadline to January 8, 2023 is warranted to ensure continuity of service while licensees work diligently to resolve the significant challenges they are currently experiencing related to the replacement of legacy network equipment utilized in the 3650-3700 MHz band.

SDG&E has a longstanding commitment to safely and reliably provide energy to its 3.6 million customers across San Diego and southern Orange County, CA.² SDG&E operates and continually upgrades a comprehensive communications infrastructure that enables it to safely manage a service territory spanning 4,100 square miles. As part of these efforts, SDG&E has

¹ Waiver of Sections 90.1307(c) and (d) and Sections 90.1338(a) and (b) of the Commission’s Rules, WT Docket No. 18-353, Petition for Waiver (filed Nov. 28, 2018).

² See, e.g., Chris Jennewein, *SDG&E and Florida Utility Ranked Most Reliable in the United States*, Times of San Diego (Nov. 29, 2018), available at <https://timesofsandiego.com/business/2018/11/29/sdge-and-florida-utility-ranked-most-reliable-in-the-united-states/>.

already expended time and capital transitioning its legacy operations in the 3650-3700 MHz band to Part 96-compliant network equipment.

Despite this investment of time and resources, SDG&E continues to encounter a pervasive lack of commercially available equipment capable of communicating with the Spectrum Access System (“SAS”) and utilizing the Environmental Sensing Capability (“ESC”), as required by the Commission’s Part 96 rules.³ Given this ongoing unavailability of compliant equipment, SDG&E—and other 3650-3700 MHz licensees—have only a few months to complete a hardware transition to a Part 96-compliant network. This labor-intensive process necessarily involves replacing base stations and legacy network equipment that could require tower-climbs and truck rolls.⁴ Because SDG&E is only one among many electric utilities required to meet the original April 2020 CBRS transition deadline, the demand for contractors and technicians has increased and made it more difficult to hire qualified personnel to complete the necessary transition work.⁵

Meeting the April 2020 transition deadline requires careful equipment testing and integration with the SAS and ESC given the critical nature of these communications. Specifically, SDG&E relies on the 3650-3700 MHz band to facilitate mission-critical applications such as SCADA, Faulted Circuit Indication, Push-to-Talk services that protect and enhance the safety of its employees and customers, and SDG&E’s Falling Conductor Protection application. Transitioning these and SDG&E’s other wildfire risk mitigation applications is a time-consuming process that requires planning and a work pace that ensures there are no safety risks to SDG&E’s workers or potential power outages experienced by SDG&E’s customers. The Commission is likely aware of the strain that wildfires in California have been causing to utilities, and SDG&E remains committed to implementing the proper fire risk mitigation procedures that protect its infrastructure and workers. When implemented due to inclement weather or wildfires, these risk mitigation procedures will also cause delays in testing and hardware replacement.

The current record in this proceeding demonstrates that extending the CBRS transition deadline to January 8, 2023 will ensure that the transition to Part 96-compliant networks is completed in a timely manner without disrupting the critical communications carried over the 3650-3700 MHz systems heavily used by utility providers. As WISPA and UTC have correctly

³ See Letter from Louis Peraertz, Vice President of Policy for WISPA, to Marlene H. Dortch, FCC Secretary, WT Docket No. 18-353 (filed Nov. 5, 2019) (explaining that “an extension of the deadline is necessary because licensees lack sufficient time to acquire, test and install certified Part 96 compliant equipment, which has only recently become commercially available.”).

⁴ See Letter from Scott Imhoff, Vice President of Product Management at Cambium Networks, to Marlene H. Dortch, FCC Secretary, WT Docket No. 18-353 (filed May 9, 2019) (noting that “[a]t the present time, there is a limited amount of companies with certified Part 96 equipment and the supply chain of that equipment has not sufficiently evolved.”).

⁵ *Id.* (stating “[w]ithout the timely availability of commercial, certified Part 96 equipment, existing licensees face a quickly shrinking window of opportunity to deploy compliant CBRS services.”).

pointed out, “utilities cannot tolerate the risk of interference during the transition period to mission critical communications carried over their existing 3.65 GHz systems.”⁶ Similarly, SDG&E agrees with Cambium Networks that without an extension of the CBRS transition deadline, utilities “face the prospect that they will be prevented from maintaining long-deployed services for broadband, smart grid and other services.”⁷ While such a result would not only be counter to the public interest, it is also entirely avoidable if the Commission were to simply grant the Blanket Waiver. In order to manage the CBRS transition safely and with minimal impact to critical infrastructure services, SDG&E thus respectfully requests that the Commission extend the 3650-3700 MHz transition deadline to January 8, 2023, in accordance with the Blanket Waiver.

Pursuant to Section 1.1206 of the Commission’s Rules, this letter is being filed via ECFS in the above-referenced docket. Please contact the undersigned with any questions.

Respectfully submitted,

/s/ Brian D. Weimer

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⁶ Reply Comments of the Wireless Internet Service Providers Association and the Utilities Technology Council, WT Docket No. 18-353, at 6 (filed Dec. 26, 2018).

⁷ Letter from Scott Imhoff, Vice President of Product Management at Cambium Networks, to Marlene H. Dortch, FCC Secretary, WT Docket No. 18-353 (filed May 9, 2019).