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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 November 20, 2019, Jason Ervin, Senior Director Telecommunications, and Raul Garcia, Legal Counsel, of Lower Colorado River Authority (“LCRA”), along with undersigned counsel and Ari Fitzgerald of Hogan Lovells US LLP, met with Aaron Goldberger, Wireless & International Legal Advisor to Chairman Ajit Pai, to discuss the above-referenced proceeding.

LCRA described how its existing 900 MHz narrowband system operates over a wide area of over 50,000 square miles, provides coverage to many rural areas, and is shared on a non-profit basis with other utility companies and public safety entities, most of which have no other wireless connectivity option. LCRA explained that its 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. LCRA expressed concern with the interference threshold levels proposed in the NPRM in this proceeding for protecting narrowband systems, but noted that there is a developing consensus in the record that the Commission should adopt interference protection levels similar to the protection levels afforded to 800 MHz systems. For example, Anterix recently stated that it does not oppose adoption of the interference threshold of -104 dBm for mobile receivers and -101 dBm for portable receivers.¹

¹ See Letter from Elizabeth R. Sachs, Counsel for Anterix, Inc. to Marlene H. Dortch, Secretary, FCC, WT Docket No. 17-200, Attachment “Summary of Technical Issues” at 3-4 (filed Oct. 4, 2019) (acknowledging that some incumbents support adopting these interference thresholds and stating that Anterix does not oppose adoption of such thresholds to accommodate the desires of those incumbents and to align the thresholds for 800 and 900 MHz narrowband services).

LCRA reiterated that the Commission should exclude “complex” narrowband systems from any mandatory relocation obligation. LCRA recommended that the Commission adopt a definition for complex systems that includes any system with 25 or more integrated 900 MHz sites. LCRA discussed that the suggested threshold of 65 sites would inhibit the ability of critical infrastructure entities to take advantage of the continuing evolution of technology. As more advanced equipment is developed for the 900 MHz band, incumbents might be able to achieve greater spectrum efficiency that could enable them to reduce the number of sites required to achieve the coverage and reliability necessary to support critical utility operations. If the threshold for a complex system is set too high, it would deter operators of 900 MHz systems from upgrading to more efficient technology because they might otherwise lose their status as a complex system as a result of being able to operate fewer sites. Therefore, the Commission should lower the threshold for defining a complex system in order to promote flexibility in the 900 MHz band, improve spectrum efficiency, and facilitate the development of new technology for critical infrastructure.

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

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Lerman Senter PLLC

Counsel to Lower Colorado River Authority

cc: Aaron Goldberger