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Via Electronic Comment Filing System (ECFS)

January 12, 2015

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

RE: Enterprise Wireless Alliance and Pacific DataVision, Inc. Petition for Rulemaking Regarding Realignment of 900 MHz Spectrum (RM-11738)

Dear Ms. Dortch:

The Salt River Project Agricultural Improvement and Power District (District) hereby submits these comments in response to the Federal Communications Commission's ("Commission") November 26, 2014 Public Notice regarding the Enterprise Wireless Alliance ("EWA") and Pacific DataVision, Inc. ("PDV") (collectively the "Petitioners") Petition for Rulemaking seeking realignment of the 896-901/935-940 MHz ("900 MHz") band.¹

Salt River Project

The District operates the Salt River Project (Project), the oldest multipurpose federal reclamation project in the United States, serving central Arizona since 1903. As part of the Project, the District owns and operates an electric system that generates, purchases, transmits and distributes electric power to residential, commercial, industrial and agricultural power users to more than 984,000 retail customers in a 2,900 square mile service area in parts of Maricopa, Gila and Pinal Counties, plus mines loads in an adjacent 2,400 square mile area in Gila and Pinal Counties. The District is also one of the largest raw-water suppliers in Arizona.

The 900 MHz system is the primary dispatch radio system for the District and is used by Electric Distribution and Transmission Operations for day to day electric system maintenance

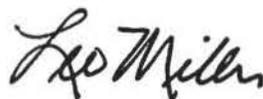
¹ See Enterprise Wireless Alliance and Pacific DataVision, Inc. Petition for Rulemaking Regarding Realignment of 900 MHz Spectrum, *Public Notice*, RM-11738 (November 26, 2014).

and construction activities. It is a reliable means for obtaining required line clearances and is preferred over cell phones because it provides the wide area knowledge of issues in real time since it is a point to multipoint dispatch communications system. The system is also used by the District's Water Operations team to facilitate accurate and timely control of water transmission and distribution operations through field personnel who operate the water distribution network manually.

The District currently holds 154 FCC licenses. As part of this, the District owns and operates a 25 Channel Trunked Radio system in this part of the 900 MHz band. This system is used to support safe and reliable water and electric service to the greater Maricopa and Pinal County, Arizona area. The system also helps to ensure safety of life, property, and the environment. The District is concerned that there may be negative impacts to the operability of the remaining 2 MHz X 2 MHz portion of the band after the proposed re-alignment. The issue lies in the fact of how the individual channels were assigned originally. They are 12.5 KHz spaced contiguous channels in blocks of 5 or 10 channels each. In order to get adequate channel spacing for use of low loss cavity combining at a multi-channel base station site, you have to pull one channel out of each of several blocks. A minimum of 500 KHz transmit channel spacing is adequate for low-loss combining but wider spacing allows for more efficient combining. It is feared that with all the licensed narrow band channels in a 2 MHz band, the crowding by all narrowband licensees in the area (especially in large urban areas where all the channels are licensed) will require individual licensees of large systems to have close spaced transmit frequencies which will require high loss "Hybrid" antenna combining. This will then require additional transmission sites for the same coverage of today and, due to the "multi-cast" nature of most digital trunked radio systems today, more sites will require more channels. It is not clear where these channels will come from in order for the petitioner to provide comparable services as mentioned in the petition.

In addition to the above comments, the District supports the comments filed by NextEra/Florida Power and Light in this matter.

Sincerely,



Leo L. Miller
Senior Attorney