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Received & Inspected  
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May 17, 2016

Federal Communications Commission  
 Mrs. Marlene Dortch, Secretary  
 445 12<sup>th</sup> Street, SW  
 Washington, DC 20554

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**Re: Proceeding RM-11681, "Comment Sought To Update The Record On Ligado's Request That The Commission Initiate A Rulemaking To Allocate The 1675-1680 MHZ Band For Terrestrial Mobile Use Shared With Federal Use"**

Dear Ms. Dortch:

VanEnkevort Tug & Barge Inc. (VTB) is a privately owned, U.S. flag bulk transport company servicing the mining, steel and construction industries on the Great Lakes. VTB operates the most modern self-discharging bulker "Great Lakes Trader" and in 2015 purchased the tug/barge Joseph H. Thompson Jr. / Joseph H. Thompson and has been a forerunner in converting older, obsolete, self-propelled steam turbine, straight deckers into self-discharging, articulated tug barge units. Of the 7 ATBs on the Great Lakes, VTB has been involved in the conversion and/or ownership of 5 of them.

Real time weather and oceanographic information has a significant bearing on Great Lakes navigation and safety, and so is crucial to the members of VTB. Therefore, VTB must oppose the FCC's plan to share the 1675-1680 MHz radio spectrum between a new terrestrial mobile provider and long established government meteorological and oceanographic data providers. Within the Great Lakes, the National Oceanic and Atmospheric Administration (NOAA) and the U.S. Army Corps of Engineers (USACE) are responsible for providing real-time and forecast weather products, plus the additional oceanographic reports necessary for safe operations. These products are used daily by VTB members to allow for safe and efficient navigation within U.S. waters. Ship operators depend on these products every day to bring ships safely between Great Lakes ports and through a complex array of locks, and that need is rapidly increasing. Sound real-time information of the following types are only becoming more important to the members of the VTB.

A NOAA program critical to the work of VTB is the National Water Level Observation Network (NWLON). Reliant on information transmitted over GOES DCS (and GOES-R DCS in the future) in 1675-1680 MHz, NWLON is a coastal observing network of more than 200 stations nationwide, which covers the Great Lakes (in addition to Pacific and Atlantic Ocean island territories). Each station collects continuous long-term water level observations to a known vertical reference. These stations also measure other oceanographic parameters in addition to water levels and other meteorological parameters. Accurate data about the ever-changing water levels of our nation's considerable inland waterways provides essential data necessary for operations, including navigation and vessel loading. NWLON data communications include near real-time routine automated acquisition and event-driven high rate acquisition over GOES DCS in 1675-1680 MHz. This data supports real time navigation systems.

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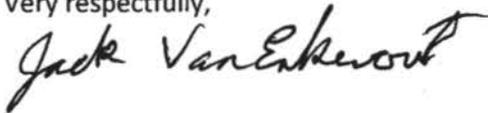
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VTB members also rely on real-time and near real-time data produced through NOAA's public-private Physical Oceanographic Real Time System (PORTS®) program and transmitted over GOES DCS in 1675-1680 MHz. PORTS data are used in navigating the locks of the Great Lakes, such as the "Soo Locks," which connect Lake Superior to the lower Great Lakes and the St. Lawrence Seaway. These locks have water level gauges whose information is transmitted via 1675-1680 MHz and are used by the USACE to operate the locks. Understanding data from these gages in real time facilitates navigation safety as our vessels transit these important gateways within the Great Lakes every day. (The Soo Locks in particular typically handle more than 80 million tons of cargo per year.)

In addition, VTB members rely on an array of sensors within harbors of the Great Lakes that also use GOES DCS information to assist in maintaining Great Lakes harbors.

In summation, VTB opposes the proposed plan to share the spectrum that supports GOES DCS and the future GOES-R DCS with a commercial terrestrial provider with high-powered transmission towers. Our members rely on the data and information carried by the GOES-R DCS system and the GOES DCS system to safely navigate the Great Lakes. If the proposed spectrum sharing is allowed to proceed, interference is highly likely from terrestrial-based signals that are much stronger than those emitted from this satellite, which will likely disrupt critically important real-time information, particularly to non-government users.

Very respectfully,

A handwritten signature in black ink that reads "Jack VanEnkevort". The signature is written in a cursive, slightly slanted style.

Jack VanEnkevort  
Vice President  
VanEnkevort Tug & Barge Inc.