

June 2, 2016

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

RE: Letter in Response to RM-11681 Petition for Rulemaking: Ligado's Request to Allocate the 1675-1680 MHz Band for Terrestrial Mobile Use Shared with Federal Use

Dear Ms. Dortch:

The American Association of Port Authorities (AAPA), the unified and collective voice of U.S. seaports, advocates policies that strengthen the ability of member seaports to serve their global customers and create economic and social value for their communities, regions, and nation. I am writing today on an issue critical to ports' ability to safely and efficiently accomplish these important goals.

AAPA has significant concerns regarding the Federal Communication Commission's plan to share 1675-1695 Megahertz radio spectrum (or portions thereof, such as 1675-1680 Megahertz) between a new terrestrial broadband wireless provider venture and long established government meteorological and oceanographic data providers. We are concerned that 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 to ships and ports.

The global trend of ships moving this freight has been increasing size – depth, width and length. This requires ships reliance on real-time and near real-time forecast weather products and oceanographic products, such as currents, tides and water heights for safe and efficient port operations. This information is provided through the National Oceanic and Atmospheric Administration's (NOAA) Physical Oceanographic Real Time System (PORTS) whose real time data has been documented to reduce accidents and improve supply chain efficiency. PORTS is a partnership between NOAA and the maritime community where the partners establish and maintain the local observing infrastructure and NOAA is responsible for data management, including its communication relay, from quality control to product generation.

PORTS program information is transmitted over the Geostationary Operational Environmental Satellite (GOES) system in the 1675-1680 MHz bandwidth. Reliable signal transmission and reception to and from the GOES Data Collection System is essential for the PORTS system to provide this essential information. Considering much of the infrastructure in the seaport environment was installed and is owned by our members, we would strongly object to disruptions in the communications infrastructure as it now is structured.

We urge the FCC not to move forward with this action unless adequate protection zones are extended to PORTS related sites. Such protection is crucial to avoid the disruption of vital information used to ensure the nation's economic health and national security interests are safeguarded. Without significant research customized to our industry community, we are not confident disruptive interference can be avoided and we will continue to oppose this effort for spectrum sharing. The small amount of radio spectrum used to relay this critical maritime operational data must be weighed against the use of other bands where support of such a major economic contributor as the seaport industry would not be a factor.

We thank you for considering our input.

Sincerely,



Kurt J. Nagle
President & CEO

cc: The Honorable John Thune, Chairman, Senate Commerce, Science and Transportation Committee
The Honorable Bill Nelson, Ranking Member, Senate Commerce, Science and Transportation Committee
The Honorable Marco Rubio, Chairman, Subcommittee on Oceans, Atmosphere, Fisheries, and Coast Guard
The Honorable Cory Booker, Ranking Member, Subcommittee on Oceans, Atmosphere, Fisheries and Coast Guard
The Honorable Mark Warner
The Honorable Timothy Kaine
The Honorable Fred Upton, Chairman, House Energy and Commerce Committee
The Honorable Frank Pallone, Jr, Ranking Member, House Energy and Commerce Committee
The Honorable Greg Walden, Chairman, Communications and Technology Subcommittee
The Honorable Anna G. Eshoo, Ranking Member, Communications and Technology Subcommittee
The Honorable Jim Bridenstine, Chairman, Subcommittee on Environment, House Science, Space and Technology Committee
The Honorable Suzanne Bonamici, Ranking Member, Subcommittee on Environment, House Science, Space and Technology Committee
The Honorable John Fleming, Chairman, Subcommittee on Water, Power and Oceans, House Natural Resources Committee
The Honorable Jared Huffman, Ranking Member, Subcommittee on Water, Power and Oceans, House Natural Resources Committee
The Honorable Don Beyer
The Honorable Lawrence E. Strickling, Assistant Secretary for Communications and Information and NTIA Administrator, Department of Commerce
The Honorable Dr. Kathryn D. Sullivan, Under Secretary of Commerce for Oceans and Atmosphere and NOAA Administrator