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Mark W. Barker
President

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FCC Mailroom

June 6, 2016

Federal Communications Commission
Mrs. Marlene Dortch, Secretary
445 12th 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:

The Interlake Steamship Company is a privately held company which owns and operates 9 U.S.-flag vessels (lakers) on the Great Lakes and carry the raw materials that drive the nation's economy: iron ore and fluxstone for the steel industry, aggregate for the construction industry, coal for power generation. We can transport roughly 20 million tons of dry-bulk cargo per year and employ more than 350 men and women, all of whom are U.S. citizens. In turn, the cargos Interlake carry help generate and sustain more than 103,000 jobs in the eight Great Lakes states and have an annual economic impact of more than \$20 billion

Real time weather and oceanographic information has a significant bearing on Great Lakes navigation and safety, and so is crucial to the safe navigation of our vessels. Therefore, we 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 Interlake vessels 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 safety of vessel navigation.

A NOAA program critical to the work of Interlake 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

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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.

Interlake also relies 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, Interlake relies 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, The Interlake Steamship Company 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,



Mark W. Barker
President