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FLORIDA RELIABILITY COORDINATING COUNCIL

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April 29, 1999

MAY 5 1999

FCC MAIL ROOM

Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

Dear Sir or Madam:

Re: In the matter of RM-9404 - Amendment of Parts 2 and 97 of the Commission's Rules to Create Low Frequency Allocations for the Amateur Radio Service

Introduction

The Florida Reliability Coordinating Council, (FRCC) is a reliability region of the North American Electric Reliability Council (NERC), and respectfully submits reply comments in response to the Public Notice regarding the Petition for Rulemaking filed by the American Radio Relay League, Inc (ARRL).

Discussion

The Florida Reliability Coordinating Council (FRCC) membership includes all of the electric utilities operating in Florida, as well as independent power producers and power marketers. The FRCC is responsible for the overall reliability of the electric power grid in the State of Florida. Our members coordinate every facet of their operation, which has an impact on statewide electric reliability issues, in order to ensure that we can minimize widespread electrical outages in the state.

The FRCC coordinates Power Line Carrier communications due to its importance on the electric reliability in the State of Florida. All electric utilities rely on Power Line Communications for protection, control and operation of our high voltage transmission system. If the Power Line Carrier communications system is compromised by proposals, such as this matter of RM-9404, it would put the integrity of the high voltage transmission at risk, thereby creating the potential for outages of our main high voltage transmission system which could result in widespread power outages in the state.

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Electric utilities have relied on Power Line Carrier communications for over 50 years and continue to utilize Power Line Carrier communications in the critical areas of relay protection and Supervisory Control and Data Acquisition (SCADA). In many cases Power Line Carrier communications is the only viable means of providing the protection, control, and operation for many transmission facilities, which are in remote areas.

In early 1989, a memorandum of understanding between the Federal Communications Commission (FCC), the National Telecommunications and Information Administration (NTIA), the North American Electric Reliability Council (NERC) and the Utilities Telecommunications Council (UTC) was signed to establish and maintain a transmission Power Line Carrier Data Base (PLCDB) and a Licensed User Data Base (LUDB) which provides the information necessary for the identification and notification of potential interference between PLC and LU facilities. This activity was implemented in response to FCC Report and Order in General Docket 82-9 relative to PLC operation in the 10-490 kHz band. The database was originally maintained by NERC but was later transferred to UTC. UTC is now referred to as UTC, The Telecommunications Association. Utilities support the maintenance of the database by providing UTC information on the carrier sets in operation and the frequencies being used.

Conclusion

The FRCC **opposes** the amateur radio allocation requested by the American Radio Relay League, Inc. (ARRL). There is a real potential for interference from ARRL members to the critical PLC channels that are providing protection, control, and operation of Florida's transmission network. If this interference does occur, it would create outages of the high voltage transmission system, which could cause widespread power outages in the State of Florida. Since the use of the PLC channels by utilities is national in scope, these interruptions could occur in all parts of the country as well.

Sincerely,

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

Tom Boudewyns
Chairman
FRCC Telecommunications
Subcommittee

cc: Mr. Joe A. Garcia
Chairman
Florida Public Service Commission



Florida Power & Light Company, P. O. Box 029100, Miami, FL 33102-9100

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