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<DESCRIPTION>Filed Comments by Alliant Energy in matter of Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended. NPRM WT Docket No. 99-87
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<TEXT>COMMENTS OF ALLIANT ENERGY ON NPRM WT DOCKET No. 99-87

Pursuant to Section 1.415 of the FCC's Rules, Alliant Energy hereby submits its Comments in response to the Notice of Proposed Rulemaking, released March 25, 1999, in the above-referenced docket. Alliant Energy and its subsidiaries are engaged in the generation, transmission and distribution of electricity, gas, water and steam to its customers in Iowa, Minnesota, Wisconsin and Illinois. Alliant Energy urges the FCC to protect the availability of spectrum for critical infrastructure industries such as Alliant Energy's. Alliant Energy supports the position of UTC, and offers the following additional comments in support.

Introduction:

Alliant Energy is the parent company of three (3) utilities, Wisconsin Power and Light, Interstate Power Company and IES Utilities Inc.

These three utilities are engaged in the generation, transmission and distribution of electricity, gas, water and steam to its customers in Iowa, Minnesota, Wisconsin and Illinois. As such, they are eligible for and use private land mobile radio (PLMR) frequencies under FCC Part 90.63 to support their day-today operations.

Currently, Interstate Power and IES Utilities are licensed with 800 MHz frequencies and use these frequencies for both voice and data communications in support of their Operations. In addition, Wisconsin Power and Light is in the process of redesigning its radio network to also operate at 800 MHz. This recent effort includes pending applications at the FCC for additional 800 MHz in Wisconsin.

The demographics of each utility's service territory included a significant portion of rural territory. The total combined Alliant Energy service territory is greater than 54,000 square miles. The ability to own and operate uniform, exclusive, private, wide-area radios system is critical in maintaining reliable communication support for Company operations, including public safety and emergency response.

Alliant Energy urges the FCC to maintain the current site/frequency coordination methods and recognize the need to allow exceptions and

exclusivity of frequency spectrum for the Utility Industry.

Comments:

Alliant Energy has great concerns in regards to NPRM 99-87. These concerns are summarized in this section.

1) Auction and Geographic Management of spectrum is incompatible with utility service territories.

Alliant Energy's and many other utilities' radio coverage needs are shaped uniquely by the requirement to support radio communications in and around the merger and acquisition of service territories and supporting transmission and distribution facilities. These coverage contours do not necessarily center around major metropolitan business areas and/or fit the MTA/BTA concept of use in other public based communications systems, such as cellular and PCS. Site-by-site and wide area licensing should be maintained for utilities and pipelines since their service territories do not coincide with predetermined auction territories.

2) Lack of public network build-out in rural territory and difficulty integrating public and private networks for wide area support .

Alliant Energy's service territory is comprised of 54,000 square miles, much of it rural. Historically Alliant has researched the best economical and available means for radio communications. This research has always yielded the same results; there are no wide-area radio communications networks that reach into the Alliant's rural territory and match its coverage contour requirements. Alliant Energy has had to license and build out its own radio network to match its radio coverage and communications requirements.

In one recent case, Alliant Energy approached the major cellular companies in its service territories about implementing a wireless data (CDPD) on their networks in order to avoid having Alliant Energy build out its own dedicated infrastructure. Despite requests from Alliant Energy and some public safety agencies, no cellular company was willing to invest in a wide-area communications solutions in rural territory.

Lastly, as part of a recent merger, Alliant Energy engineers had to design and merge the three existing utility radio systems into one common radio system for the Company. We have had many technical problems with integrating them into our centralized dispatch system, with our mobile users experiencing operational problem when roaming between systems. To try to do this same integration between multiple public systems and build out comparable public radio coverage across our territory would prove to be a very complicated and nearly impossible undertaking.

3) Utility/pipeline radio systems help to protect public safety.

Alliant Energy is very concerned about the ability to maintain control of its communication systems. The FCC should not restrict the use of exempt radio spectrum to only communications directly related to public safety agencies. Utility/pipeline companies require the ability to maintain control of frequencies and their communication networks for mission critical support. As such, they also need private spectrum to support radio systems and cannot count on public spectrum and systems for its critical operations. In times of emergency and disasters, public systems are not necessarily reliable and, if operational, they can be overwhelmed by extraneous public traffic.

A few years ago Iowa experienced extensive flooding, during this time of public emergency, the cellular phone network was too busy in areas to support immediate communication for restoration and coordination efforts. Alliant Energy's relied on its private internal communication network for:

- Connection and disconnection of electric and gas lines to support flood clean-up and repair;
- Isolation and repair of downed power lines; and
- Coordination of internal utility efforts for protection of utilities sites and infrastructure for flood damage

Cellular systems were constantly busy and other public could not be counted on as a safe means of communication.

4) Incumbent systems in bands affected by auctions must be protected.

Alliant Energy has a significant investment in its radio communications infrastructure. This investment includes, not only radio communications equipment, such as base station and mobiles, but also, antennas, lines, towers, dispatch switches/computers and microwave and fiber communications support equipment.

Currently, Alliant Energy has approximately:

- 130+ radio communications towers
- 3000+ mobile/portable radios
- 100+ dispatch points, including a multi-million dollar centralized-dispatch control center.

Possible auctioning of our currently licensed spectrum would negatively impact, and most likely require replacement, of this infrastructure. Auctioning of the spectrum used by Utility/pipeline companies would cause extreme cost to be absorbed by these companies, both in loss of operational functionality and replacement dollars.

Alliant Energy estimates the dollar cost for replacing its existing system could well exceed \$30 million dollars. This is a cost that would not otherwise be incurred if Alliant Energy were allowed to retain its current licensing and radio communications infrastructure.

Alliant Energy requests the FCC consider this financial impact along with the above referenced operation concerns.

Conclusion

In conclusion, Alliant Energy urges the FCC to take action in accordance with the view expressed in these comments.

Respectfully submitted,

Alliant Energy

Dated: 30, July, 1999

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