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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAY 22 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Amendment of Part 2 and Part 90 of the)	
Commission's Rules To Allocate the)	RM-9854
1427-1432 MHz Band for Automatic Meter)	
Reading and Utility Telemetry Use)	

COMMENTS OF RELIANT ENERGY MINNEGASCO

Reliant Energy Minnegasco, by its attorney, hereby strongly supports the petition for rulemaking (the "Petition") filed by Itron, Inc. ("Itron") requesting that the Commission amend Parts 2 and 90 of its rules to allocate the 1427-1432 MHz band, on a primary basis, for automatic meter reading ("AMR") and utility telemetry operations.

DISCUSSION

Reliant Energy Minnegasco is a gas distribution company located in Minneapolis, Minnesota, serving 660,000 in metropolitan Minneapolis and surrounding suburbs.

As described in the Petition, Congress in 1992 directed the federal government to foster the development of new and innovative AMR technologies based on its view that AMR technologies would help to promote efficient energy use and protect the public health and safety.¹ At the time, the Department of Energy concluded that there was no need to seek spectrum from NTIA for AMR systems given that the FCC already had begun to license AMR systems in the 1427-1432 MHz band.

In view of the FCC's early licensing of AMR systems in the 1427-1432 MHz band, and because of the success of those systems in co-existing with federal government operations in the band and radio astronomy operations in a lower adjacent band, NTIA transferred the 1427-1432 MHz band to the FCC for private commercial use. For the reasons set forth in the Petition and herein, the FCC now should take the next logical step and make the band "a permanent home for

¹ Petition at 1-3 (citing Public Law 102-556, 106 Stat. 4181 (Oct. 28, 1992)).

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AMR and utility telemetry operations.”² Allocating the 1427-1432 MHz band for AMR operations would be fully consistent with the Commission’s policies and would complete the process begun by Congress almost ten years ago.

First, use of the band for AMR services would help to support critical infrastructure industries. AMR systems use wireless technologies to monitor systems remotely and to collect data from distant and widely dispersed locations in a timely and cost-effective manner. They not only, therefore, enhance utility productivity and efficiency, but also speed utility responses to natural disasters or other system anomalies that may pose a threat to public health or safety. For this reason, the use of AMR systems is expanding rapidly. As Itron notes in the Petition, the Strategis Group estimates that a third or more of utility meters will be connected to wireless networks within the next five years.³

We have been installing Itron’s automated devices since early 1980 and currently have 460,000 of our accounts automated. These are the same devices that are read by Itron’s Fixed Network. While having these devices in place has proven to be the most cost effective way for us to obtain monthly reads, it is also a bridge to more frequent reads as requirements resulting from deregulation become more apparent. While our plans for more frequent reads are far from solid, it is apparent that we are in a position to use some form of AMR that will use the radio frequencies covered under the current license.

There are already millions of dollars invested in AMR networks at 1427-1432 MHz. Reliant Energy Minnegasco alone has about \$25,000,000 invested in this technology. Requiring AMR systems to relocate out of the 1427-1432 MHz band would, therefore, be costly, disruptive, and inefficient.

Second, allocating the 1427-1432 MHz band for AMR operations and utility telemetry would be spectrum efficient. As the Commission has itself recognized, the usefulness of the 1427-1432 MHz band is limited by on-going military operations (until 2004), and by radio astronomy operations in the lower adjacent band. AMR and utility telemetry systems, however,

² Petition at 7.

³ Petition at 6.

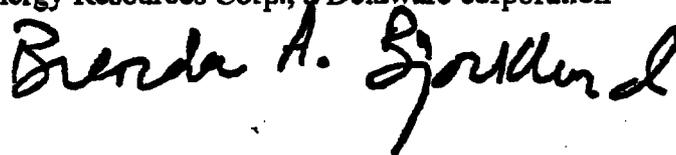
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already have demonstrated that they can co-exist with the military users of the band, and that they will not cause harmful interference to radio astronomy at 1400-1427 MHz.

Thus, by allocating the 1427-1432 MHz band for AMR technologies, the Commission could foster the development of services that are of vital — and growing — importance to the critical infrastructure industries while promoting efficient spectrum usage. For those reasons, Reliant Energy Minnegasco supports Itron's Petition asking that the Commission allocate the 1427-1432 MHz band on a primary basis for AMR and utility telemetry operations.

Respectfully,

Reliant Energy Minnegasco, a Division of
Reliant Energy Resources Corp., a Delaware corporation



By: _____

Brenda A. Bjorklund, Director, Law