



July 29, 2002

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
236 Massachusetts Avenue, NE
Suite 110
Washington, DC 20002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Comments of New York Independent System Operator, Inc.
ET Docket Nos. 02-98 and 02-136, RM-9404
Amendment of Parts 2 and 97 of the Commission's Rules to Create a Low
Frequency allocation for the Amateur Radio Service

Dear Secretary Dortch:

The New York Independent System Operator, Inc. (NYISO) is a not-for-profit corporation which administers the wholesale electric energy markets in New York State and oversees the operation of the State's high voltage electric transmission system. The NYISO submits this comment in response to the Commission's Notice of Proposed Rulemaking in the above-cited dockets.

High voltage transmission lines at various voltages, 765 kV, 345 kV, 230 kV, and lower voltages, carry electric power from generation stations to, from, and between switching stations and substations. Substations serve residential, commercial, and government customers throughout New York State. New York's transmission grid is also connected to the transmission systems of our neighboring states and Canada.

Many of these transmission lines utilize Power Line Carrier (PLC) communications in their protection systems. These communications utilize the metallic conductors of the transmission line itself and provide a cost-effective means to trip or block tripping of the appropriate circuit breakers when a fault occurs on the line. Correct operation of the PLC system in a small fraction of a second following a fault is ultimately critical to the dependability and security of the overall transmission system.

The NYISO is concerned that the allocation which has been requested by the Amateur Radio Service, in the range 135.7 to 137.8 kHz, includes PLC facilities presently being operated in

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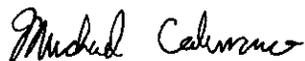
New York State under Part 15 of the Commission's Rules. We have identified seven (7) transmission lines in New York State which utilize PLC operating within the range 135.7 to 137.8 kHz.

PLC systems in this range are in active continuous use in providing electric transmission line protection communications. Allocation of this band to Amateur Radio Service introduces the potential for interference with PLC operation, which could result in the unnecessary tripping of transmission lines when there is no fault, or the failure to trip when there is a fault. In either case, this could result in unnecessary disruptions in electric power service.

We disagree that the technical requirements to be imposed on amateur stations in the 135.7 – 137.8 kHz band are adequate, given the potential risks involved. First, neither PLC use nor PLC system density is “relatively light” in New York State. (NOPR paragraph 22.) As mentioned we have identified seven transmission lines that use PLC operating in this range. Second, although an EIRP of 1 W may appear low, low power use in close proximity to a substation may be problematic.

For these reasons, the NYISO opposes this portion of the proposed rule.

Very truly yours,



Michael Calimano
Vice President, Operations
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