Edison Electric Institute
Power By Association

UTC
UTILITIES
TELECOM
COUNCIL

Strong and reliable communications are needed to support electric grid operations and to ensure the safety of emergency responders, including utility crews.

Congress has recognized the urgent need for a nationwide interoperable emergency response network that is reliable, resilient and redundant. Utilities share these needs. Indeed, utility and public safety personnel are among the first to respond in emergencies, working side-by-side to help repair and restore essential services.

By capitalizing on these synergies, both utilities and public safety communities would benefit from a truly interoperable system that allows for coordination during emergencies, while also supporting their daily operations.

- **Robust two-way communications are integral to the safe, efficient, and reliable delivery of electric power.** Since commercial communications networks can go down, get congested or overwhelmed with traffic, or become generally unavailable, utilities have developed expertise building and operating their own private, internal communications networks.

- **Mobile communications and remote access are integral to the operations of every electric utility, but as spectrum needs have increased, available spectrum has decreased.** Utilities use wireless communication to automate their operations, from control systems to line protection, and from routine dispatch to enterprise applications. While the FCC has reallocated and auctioned utility spectrum, forcing migrations to less suitable frequencies, no new spectrum has been made available to utilities since 1986.

- **Utilities provide mutual assistance to each other during disasters, allowing for a return to normal operations quickly. This is important to public safety, economic security and national defense.** A common communications platform will facilitate these critical restoration efforts with first responders and other utilities in times of disaster. In addition, a national network would bolster the market for manufacturers to produce interoperable equipment.

Electric utilities must have flexibility to use a variety of public and private networks, as well as licensed and unlicensed spectrum, to meet their communications needs.

Electric utilities rely on wireless communications to respond to emergencies; to support maintenance activities; to control and monitor remote facilities; and to dispatch field crews throughout service territories.

The electric industry appreciated that the FCC's National Broadband Plan recognized there is no single solution that will work for all regions, applications, and types of utilities. The electric power industry therefore supports the FCC making licensed spectrum available to utilities on either a dedicated basis, or via appropriate sharing arrangements.

- **Legislation should not be too proscriptive in how sharing arrangements should be structured.** Many utilities already partner with first responders on a regional basis. These arrangements ensure interoperability, maximize resources, and allow for shared priority access to the network when necessary.

- **FCC has recognized the public interest benefits of shared utility-public safety networks.** In fact, waivers granted by the FCC for these sharing arrangements recognize the enhanced interoperability, cost savings, and improved coordination these shared networks facilitate.