



The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Deval L. Patrick
GOVERNOR

Timothy P. Murray
LIEUTENANT GOVERNOR

Richard K. Sullivan, Jr.
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1181
<http://www.mass.gov/envir>

November 6, 2012

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: Wireless Bureau's Request for Comment on NSTAR Electric Company's Request for Waiver of the Suspension of Acceptance and Filing of Certain Applications for 470-512 MHz (T-Band) Spectrum; WT Docket No. 12-295

Dear Ms. Dortch:

The Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA) is submitting this letter in support of the Request for Waiver filed with the Federal Communications Commission ("FCC" or "Commission") by NSTAR Electric Company ("NSTAR" or the Company) in the above-captioned proceeding ("Waiver Request").¹ As described more fully below, the EOEEA urges the FCC to grant NSTAR's Waiver Request and process the company's pending modification application in order to improve emergency communications, which is in the interest of the company's customers.²

Background

The EOEEA is the state agency that oversees the Department of Public Utilities (DPU), which regulates NSTAR, an operating company owned by Northeast Utilities. NSTAR is involved in the generation and distribution of electricity and natural gas to customers in Eastern, Central and Southeastern Massachusetts. NSTAR transmits and delivers electricity to 1.1 million electric customers in 81 communities.

¹ See, NSTAR Electric Company, Request for Rule Waiver, FCC File No. 0005174965 (filed Sept. 13, 2012).

² Support before the FCC is not to be construed as support for rate recovery in future rate proceedings before the Massachusetts Department of Public Utilities.

To support its electric utility service area, NSTAR operates several FCC authorized facilities for land mobile communications in the VHF and UHF bands. NSTAR personnel rely on these systems to support a multitude of tasks and promote the safe, efficient and uninterrupted distribution of electricity and gas.

NSTAR has represented to EEA that it has researched various alternatives to replacing the existing legacy wideband VHF land mobile system that is subject to the Commission's narrow banding mandate. We support NSTAR's upgrades to its legacy land mobile system because the company has identified the company's existing land mobile system as requiring replacement in order to respond to emergency situations and to provide critical services to the general public and emergency response personnel. More than two years ago, NSTAR completed the planning and engineering of a narrowband UHF system to replace the wideband system.

The UHF System represents a significant upgrade over the company's legacy wideband VHF system and provides the company with a common radio platform, eliminating the need to change radios when moving between service territories. The UHF System also promotes the safety of NSTAR's personnel.

In addition, NSTAR Electric reports that the UHF System will benefit customers because the NSTAR Control Center and Service Centers can rely on the voice radio system for communicating with field personnel during emergencies or outages. NSTAR Electric further reports that NSTAR dispatch personnel can communicate with overhead or underground lineworkers, station operators and troubleshooters to provide rapid response to restore power, cut off power and/or protect public safety. Finally, EEA understands that the field crews can now use the same radio system to communicate with one another even as they move throughout the NSTAR Service Territory making it possible to easily move crews from service centers that may not be affected by the storm or other emergency.

Grant of the Waiver Request is in the Public Interest

According to the Company, the situation is the following. In July 2010, it began modifying its existing UHF licenses to permit the company to upgrade to the narrowband UHF System and that the Commission granted several license modifications as part of this migration. Two of three portions of NSTAR's service territory have migrated to the new UHF System. The northern portion of NSTAR's service territory, which includes Norfolk, Suffolk and Middlesex counties, is intended to be served by station WQAK 981 and has not yet completed the migration to the UHF System.

NSTAR has informed us that it submitted an application to modify the license for station WQAK 981 ("Modification Application") for frequency coordination more than six months before the Commission announced its T-Band freeze. The Modification Application seeks to

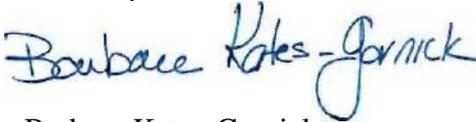
November 6, 2012

Page 3

modify certain site and transmitter information to permit the northern portion of NSTAR's service territory to migrate to the UHF System.

We appreciate your consideration of this matter.

Sincerely,

A handwritten signature in blue ink that reads "Barbara Kates-Garnick". The signature is written in a cursive style with a large initial 'B' and a long, sweeping underline.

Barbara Kates-Garnick
Undersecretary for Energy