

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

In the Matter of )  
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Request by Itron, Inc. for ) WT Docket No. 13-195  
Waivers of the Commission’s Rules )  
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**COMMENTS OF SPACE DATA CORPORATION**

Space Data Corporation (“Space Data”) submits these reply comments in response to the Public Notice seeking comment on the request of Itron, Inc. (“Itron”) for waivers of certain Commission rules to permit it to use its 931 MHz band paging licenses for non-paging operations (“Itron Waiver Request”).<sup>1</sup> Space Data takes no position on the merits of the Itron Waiver Request, but takes this opportunity to discuss the importance of smart grid and other critical infrastructure initiatives, and the availability of narrowband personal communications service (“NPCS”) spectrum that can help advance those initiatives.

The Commission’s 2010 National Broadband Plan identified smart grid as a key goal for the United States.<sup>2</sup> President Obama also has directed the Office of Science and Technology Policy to promote the deployment of the smart grid.<sup>3</sup> The National Broadband Plan noted that over 3000 electric utility companies use a wide variety of communications networks in the management and

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<sup>1</sup> *Wireless Telecommunications Bureau Seeks Comment on Itron, Inc. Request For Waivers of Part 22 Rules to Facilitate Provision of Non-Paging Operations Over 931 MHz Licenses*, Public Notice, WT Docket No. 13-195, DA 13-1733 (rel. Aug. 8, 2013).

<sup>2</sup> *Connecting America: The National Broadband Plan at 265-80 (2010)* (“National Broadband Plan”), available at <http://www.broadband.gov/plan/>.

<sup>3</sup> *See, e.g., Executive Office of the President National Science and Technology Council , A Policy Framework for the 21<sup>st</sup> Century Grid: A Progress Report (Feb. 2013)*, available at [http://www.whitehouse.gov/sites/default/files/microsites/ostp/2013\\_nstc\\_grid.pdf](http://www.whitehouse.gov/sites/default/files/microsites/ostp/2013_nstc_grid.pdf).

operation of the electrical grid. Utilities across the country are exploring and deploying smart grid solutions to manage and operate critical assets more efficiently. Indeed, Itron's Waiver Request highlights the continued interest and adoption of advanced communications systems and solutions for the electrical grid and for other mission critical needs.

Smart grid and critical infrastructure can encompass a wide variety of solutions, including but not limited to intelligent monitoring systems, automatic meter reading, advanced metering infrastructure, outage management systems, supervisory control and data systems, and remote power monitoring.<sup>4</sup> These types of solutions benefit the public welfare in a wide variety of ways. They allow utilities to intelligently detect issues within their systems and take steps to minimize or mitigate those problems. They also allow utilities to operate more efficiently and effectively, and consumers to make more informed choices, all of which helps manage energy consumption.

Smart grid and similar initiatives also benefit economic development and job creation. As Acting Chairwoman Clyburn previously remarked:

The deployment and adoption of smart grid technologies could have a profound beneficial impact on the Nation's economy. Smart grid technology and implementation, will require the manufacturing and installation of meters, relays, switching gear, and other hardware products. Creating and installing this technology, will require a multi-disciplined, labor-intensive effort that will not only create jobs in the near term, but a sustainable job market for years to come.

The U.S. Department of Commerce estimates that the smart grid could help reduce power demand by 20 percent, will lead to a reduction in greenhouse gas emissions, and will give us the opportunity to develop a highly innovative sector of the economy, creating new and high-skilled jobs. The Recovery Act smart grid investments alone are projected to

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<sup>4</sup> The Federal Energy Regulatory Commission previously estimated that the number of smart meters will increase from eight million in 2010 to 80 million in 2019. *See* National Broadband Plan at 269. The U.S. Energy Information Administration estimated that as of January 2013 there were more than 37 million electric smart meters deployed within the United States (which does not even take into consideration national gas or water meters). *See* U.S. Energy Information Administration, Frequently Asked Questions, *available at* <http://www.eia.gov/tools/faqs/faq.cfm?id=108&t=3> (last visited Sept. 18, 2013).

directly create 43,000 jobs and support another 61,000 in the private sector.<sup>5</sup>

Access to spectrum is necessary for utilities to reap the benefits of smart grid and other critical infrastructure initiatives. NPCS spectrum is ideal for such uses because it provides a private, protected wireless system for mission critical locations. Application and infrastructure companies and utilities already are using NPCS spectrum for smart grid applications, such as wireless meter reading and demand response and distribution automation applications.<sup>6</sup> Space Data also has aggregated nearly 2 MHz of NPCS spectrum nationwide in the 901/930/940 MHz bands, which it has used to provide similar applications and services to the oil and gas industry, allowing its customers to better and more efficiently manage their assets. In addition, Space Data has worked with multiple utility companies as they develop smart grid solutions and has made its NPCS spectrum available to meet the utilities' spectrum needs for their smart grid and critical infrastructure systems. Space Data welcomes further discussions on the benefits of licensed NPCS spectrum as an important step in constructing secure, intelligent communications systems.

Respectfully submitted,

SPACE DATA CORPORATION

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<sup>5</sup> Prepared Remarks of FCC Commissioner Mignon L. Clyburn, Georgia Green Economy Summit, "Networking the Green Economy", Atlanta, Georgia (Sept. 27, 2012).

<sup>6</sup> See, e.g., Comments of Sensus USA, Inc., WT Docket No. 09-217 (Jan. 8, 2010).