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Before the  
**Federal Communications Commission**  
**Washington, D.C. 20554**

In the Matter of )  
 )  
Amendment of the Commission’s Rules with ) GN Docket No. 12-354  
Regard to Commercial Operations in the 3550- )  
3650 MHz Band )

**COMMENTS OF SALT RIVER PROJECT AGRICULTURAL IMPROVEMENT AND POWER**

**DISTRICT**

The Salt River Project Agricultural Improvement and Power District (SRP) is an agricultural improvement district organized under the laws of the State of Arizona. It is a political subdivision of the State of Arizona and has the rights, privileges and immunities of a municipal corporation. SRP is a power and water utility that is located in the major metropolitan Phoenix, Arizona area.

**INTRODUCTION**

1. On December 12, 2012 the Commission issued a Notice of Proposed Rulemaking (“NPRM”), under GT Docket 12-354, proposing the creation of a new Citizens Broadband Service (“CBS”) sharing the 3550-3650 MHz band with incumbent users, with a supplementary proposal to incorporate the 3650-3700 MHz band under the new regulatory regime. On April 23, 2014 the Commission issued a Further Notice of Proposed Rulemaking (“FNRPM”), under GT Docket 12-354.
2. SRP considers the 3650-3700 MHz band an important spectrum option for Smart Grid networks. As the Commission is well aware there are very few suitable spectrum options readily available to utilities for the implementation of Smart Grid networks in compliance with Title XIII of the Energy Independence and Security Act of 2007 (EISA). The current rules and policies in place for the 3650-3700 MHz band are not optimal but nevertheless, this band represents one of the few spectrum options available for deploying a Wireless Field Area Network in support of our Smart Grid initiative.

3. We applaud the Commission's efforts to improve the overall efficiency of usage within the spectrum band 3550-3650 MHz by means of the two techniques; small cells and spectrum sharing managed by the Spectrum Access System ("SAS"). We also see considerable merit in the two tier approach for the awarding of licenses; Priority Access Licenses ("PAL") and General Authorized Access ("GAA") licenses. Our comments in response to the FNPRM are based on our evaluation of the proposed rules and policies for the CBRS and how these proposals would impact our ability to deploy a secure and reliable Smart Grid Field Area Network in the 3650-3700 MHz band if the same rules were extended to cover the 3650-3700 MHz band. Our thoughtful review raises several concerns about the conditions under which the 3650-3700 MHz band would be included (§163) within the CBRS regulatory regime. Our concerns with suggested remedies are described in the following paragraphs.

#### **RESPONSE TO FNPRM**

4. PAL vs. GAA license (§43, §56): SRP would prefer a license for long term system viability. General access rules can make it difficult to plan for long term system design/operation/reliability, etc. But competing for spectrum licenses in an auction scenario with carriers and spectrum speculators is usually outside the budgetary constraints of utilities. The current rules for 3650-3700 MHz are manageable between users with locally appointed coordinators and we don't see the necessity of adding automated frequency management and other complexities similar to those implemented in the TV white space spectrum.
5. Channel sizes – 10 MHz (§47): SRP would prefer multiple channel sizes based on the standard channel plans for LTE and not just fixed 10 MHz channels.
6. License term 1 year expandable to 5 years (§49): SRP prefers 10 year license terms. This is more in line with normal utility telecom equipment/system amortization time frames and reduces risk.

#### **SUMMARY**

7. Although SRP sees many merits in the proposed rulemaking we have serious reservations about the applicability of many of these rules in our efforts to deploy networks to meet our goals for a complete end-to-end Smart Grid network. The existing rules and policies for the 3650-3700 MHz band are

quite suitable for our purposes. On the other hand, it is our view that the rules and policies being considered for the CBRS regime if extended to the 3650-3700 MHz band would be detrimental in our efforts to use this spectrum for our Smart Grid network. We strongly urge the Commission to consider the above in making a final determination for the 3650-3700 MHz band. The implementation of a nation-wide Smart Grid network has the potential for significant public benefit leading to improved energy efficiency, operational efficiencies leading to lower utility costs, improved grid reliability and security, and faster disaster recovery. The Commission can play a key role by implementing a Smart Grid friendly regulatory environment.

Respectfully submitted,

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Chris Campbell, Manager – Communications Engineering

Salt River Project

July 14, 2014