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U.S. Department of Energy  
Office of the General Counsel  
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Room 6A245  
Washington, DC 20585

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**RE: NBP RFI Reply Comments: Communications Requirements**

The National Rural Electric Cooperative Association (NRECA) is the national service organization representing more than 900 not-for-profit, member-owned rural electric cooperatives (“Cooperatives”). Cooperatives provide retail electric service to more than 42 million consumers in 47 states, and combined, cover about 75 percent of the nation’s land mass.

APPA is a national service organization that represents the interests of more than 2,000 publicly owned, not-for-profit electric utilities (“Public Power Systems”) located in all states except Hawaii. Approximately 45 million Americans receive their electricity from public power systems operated by municipalities, counties, authorities, states, or public utility districts.

NRECA and APPA file these brief reply comments in support of the comments and reply comments filed by the Utilities Telecom Council (“UTC”). Both organizations strongly believe that the Administration should ensure that adequate spectrum is available for internal, utility networks. Integrating Smart Grid technologies into Cooperative and Public Power Systems will necessitate enhanced communications networks. In some instances, Cooperatives and Public Power Systems may choose a commercial provider for at least some portion of their

communication network service needs. However, continued concerns about coverage gaps, reliability, survivability and cost will likely mean that most Cooperatives and Public Power Systems will continue to rely on their own, private communications networks to support mission-critical functions.

**The organizations agree with UTC that access to 30 MHz of spectrum below 2 GHz is vitally important to support Smart Grid and other utility communications needs.** UTC's reply comments cite ample agreement among all the electric industry sectors of the need for licensed spectrum. While unlicensed spectrum is used by a number of utilities now, in many instances, it is because licensed frequencies are not available or are inadequate – plagued by interference and congestion or are narrowband. For these reasons, unlicensed spectrum is considerably less desirable. Not surprisingly, the only opposition to providing utilities with greater access to spectrum comes from organizations representing commercial carriers<sup>1</sup>, which would presumably like to limit utilities' options and thus improve their member companies' business prospects.

**Commercial carriers seem to suggest that utilities are not well positioned to build such networks themselves. We disagree.** The comments of the commercial providers and their respective trade associations tout the extent of current commercial networks and mostly make general assertions of their ability to serve clients that require highly secure and reliable communications.<sup>2</sup> Yet, the fact remains that all the electric utility sectors identified a number of shortcomings in commercial providers' services, with UTC highlighting many of these in its reply comments. It has not been specifically shown how a commercial network designed to

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<sup>1</sup> See, CTIA – The Wireless Association comments at 14 (expressing outright opposition to dedicated spectrum for the smart grid) and National Cable Television Association comments at 3-5 (arguing that commercial networks are most cost effective and capable than private, internal utility networks).

<sup>2</sup> See, e.g., National Cable Television Association comments at 4-5; CTIA – The Wireless Association comments at 8-12; Verizon comments; and AT&T comments.

support another client or function (e.g., military base, a hospital, or e-commerce applications) is substantially similar to the type of multi-tiered networks needed by utilities to operate various Smart Grid and other utility applications over widely varied electric service territories.

NRECA and APPA appreciate this opportunity to engage in a national dialogue regarding utilities' communications requirements. Many Smart Grid technologies will necessitate that utilities build more robust communications networks. As no "one size fits all" solution exists to address each utility's unique needs, it is of vital importance that every utility – Cooperative, Public Power System, or investor-owned utility – have options, particularly the option to construct and operate a private, internal network that uses licensed spectrum. Therefore, as the Department of Energy prepares a report based on its findings and conclusions developed through this Request for Information process, we urge that this report recommend the allocation of 30 MHz of spectrum below 2 GHz for licensed, wireless utility communications networks.

Respectfully submitted,

NATIONAL RURAL ELECTRIC  
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