



January 28, 2022

Mr. Puesh M. Kumar  
Acting Principal Deputy Assistant Secretary  
Office of Cybersecurity, Energy Security and Emergency Response  
1000 Independence Ave., SE  
Washington, DC 20585

Re: Request for Meeting to Discuss Potential Interference to Utility Mission Critical Communications Systems

Dear Mr. Kumar:

On behalf of the Edison Electric Institute, the American Public Power Association, the National Rural Electric Cooperative Association, and the Utilities Technology Council, we are writing to request a meeting with you and your colleagues at the Department of Energy (DOE) to follow-up from Joint Electricity Subsector Coordinating Council (ESCC) – Energy Government Coordinating Council (EGCC) discussions in 2021 with regard to the threat of radiofrequency interference to utility microwave communications systems in the 6 GHz band and the impact to the electric industry’s ability to maintain critical facilities and respond effectively during an emergency.

Our concerns on this issue stem from real-world tests performed by Southern Company, the Electric Power Research Institute and Lockard & White (Southern Company Study) that show that Federal Communications Commission (FCC or Commission) certified, commercially available 6 GHz low-power indoor (6 GHz LPI) devices are certain to cause widespread harmful interference to licensed microwave communications systems.<sup>1</sup> These are critical communications systems that electric utilities use for a variety of mission-critical applications including voice traffic with personnel and data traffic for SCADA and protective relaying, as well as other applications supporting electric utility security. The FCC continues authorizing automated frequency coordination systems for standard power 6 GHz devices, and it is considering expanding unlicensed operations in the 6 GHz band. This exacerbates our concerns regarding the impact of harmful interference to utility microwave systems.<sup>2</sup>

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<sup>1</sup> The report documenting the results of these interference tests was provided to the staff of the FCC’s Office of Engineering and Technology. See Letter from Larry Butts, Manager, Telecom Engineering, Southern Company Services, Inc. to Marlene H. Dortch, Secretary, Federal Communications Commission in ET Docket No. 18-295 and GN Docket No. 17-183 (filed June 23, 2021); and see Attachment A: Test Report on the Effects of 6 GHz Unlicensed RLAN Units on Fortson to Columbus Microwave Link June 21, 2021, available at <https://www.fcc.gov/ecfs/filing/106231367519302> (“Southern Company Study”).

<sup>2</sup> See The Commission Begins the Process for Authorizing 6 GHz Band Automated Frequency Coordination Systems, Public Notice, ET Docket No. 21-352, rel. Sept. 28, 2021. See also Unlicensed Use of the 6 GHz Band, Further Notice of Proposed Rulemaking, ET Docket No. 18-295, GN Docket No. 17-183, 35 FCC Rcd. 3852 (2020)(proposing to allow very low power operations, higher power 6 GHz LPI operations, mobile standard power access point operations, and higher power limits and antenna directivity for standard-power access points) and The Office of Engineering & Technology Seeks Additional

It is our hope that by working together we can avoid what the nation has seen play out in recent weeks between the airlines, the Federal Aviation Administration, the Department of Transportation, the White House, the FCC, and wireless communications carriers over harmful interference from 5G towers near airports.

We would be pleased to meet with you at your earliest convenience to further discuss our concerns around the reliability impact from harmful interference from 6 GHz LPI devices operating in the 6 GHz band, and discuss facilitating an interagency discussion and collaboration with the FCC on this issue.

Thank you for your consideration of this meeting request and we look forward to your reply. If you have any questions, please contact the undersigned.

Sincerely,

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