

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, DC 20554**

In the Matter of)
)
Expanding Broadband Opportunities in the) WT Docket No. 24-99
896-901/935-940 MHz Band) RM-11977
)

To: The Commission

**COMMENTS OF
THE NATIONAL RURAL ELECTRIC COOPERATIVE ASSOCIATION**

The National Rural Electric Cooperative Association (“NRECA”) hereby submits its Comments in support of the Petition for Rulemaking (“Petition”) filed by ten entities asking the FCC to create an option for 5/5 megahertz broadband networks in paired 896-901 MHz and 935-940 MHz spectrum (900 MHz band”).¹ The Petitioners are electric utilities or entities that support utility activities.² The current connectivity and bandwidth requirements of those utilities and their expectation of additional use cases in the future are shared by NRECA’s not-for-profit rural electric cooperative members that provide energy to 56% of the Nation’s landmass and about 42 million people across 48 states.

NRECA supported the Federal Communications Commission (“Commission”) decision to authorize a 3/3 megahertz broadband segment in the 900 MHz Band conditioned on

¹ See *Wireless Telecommunications Bureau Seeks Comment on Petition for Rulemaking to Expand Wireless Broadband in 900 MHz Band*, WT Docket No. 24-99, Public Notice (rel. Apr. 2, 2024) (“Public Notice”).

² The Petitioners are Ameren Services Company, Evergy Companies, Lower Colorado River Authority, Portland General Electric, San Diego Gas & Electric, Southern Communications Services, Inc., and Xcel Energy Services, Inc., along with Anterix, Inc., Enterprise Wireless Alliance, and Utility Broadband Alliance.

interference protection for incumbents and compensation for their relocation.³ Those conditions have been met in the four years since the rules were adopted. The Petitioners, some of whom are already in the process of deploying 3/3 megahertz broadband networks, have explained why now providing an option for a 5/5 megahertz opportunity would be fully consistent with the Commission's broadband objectives as well as the Administration's energy policy initiatives. This reasoning is equally applicable to the NRECA's members whose need for smart grid and broadband capability in the more rural areas they serve is compelling.

NRECA explained in its filing in the 2020 900 MHz Proceeding that rural American faces an acute shortage of broadband spectrum to support electric operations and potentially broadband. The 900 MHz Band, both the current 3/3 megahertz broadband segment and the proposed 5/5 megahertz option, offer a meaningful opportunity for NRECA's rural cooperatives to secure broadband spectrum that will enable them to participate in the ongoing grid modernization needed to provide safe, reliable, and effective electric service to the American public. That is as important in the rural areas where NRECA members keep the lights on and industry working as it is in urban and suburban communities. Indeed, the towers and other infrastructure that will be deployed by rural utility operators may facilitate commercial broadband service through sharing arrangements that promote cost-efficiency for both networks.

NRECA previously explained in 2020 that several NRECA members operate narrowband systems in the 900 MHz band. Where those incumbent systems are in use, they are critical to

³ See *Review of the Commission's Rules Governing the 896-901/935-940 MHz Band*, WT Docket No. 17-200, Report and Order, Order of Proposed Modification, and Order, 35 FCC Rcd 5183 (2020) (2020 900 MHz Proceeding').

the safe and effective generation, transmission, and distribution of utility services to the public. Migration of those systems to other bands may not be possible, may be prohibitively expensive, or may be unduly burdensome for rural cooperatives focused primarily on “keeping the lights on”. NRECA believes that the market-based, voluntary exchange process proposed in the Petition strikes an appropriate balance between promoting a 5/5 megahertz option in the band and safeguarding incumbent systems. In addition, as part of the rulemaking, NRECA requests the Commission evaluate whether the introduction of 5/5 megahertz broadband operations warrants changes to the incumbent interference protections adopted for the 3/3 megahertz realignment.

Members of the electric utility industry, wherever located, face common challenges as well as opportunities. The support from major utility operators around the nation for a 5/5 megahertz option and their explanation of the capacity and latency benefits such an option would provide are clear evidence that the Commission should move expeditiously to adopt a Notice of Proposed Rulemaking consistent with the Petition. NRECA urges it to do so.

Respectfully submitted,

National Rural Electric Cooperative Association

/s/ Brian M. O'Hara

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