

## **Resolution Urging the Federal Communications Commission to Protect Critical Infrastructure Incumbents in the 6 GHz Band**

**WHEREAS**, in May 2018, the Utilities Technology Council passed a resolution called “Mobile Communications Operations in the 6 GHz Band” requesting that the Federal Communications Commission (FCC, the Commission) rescind its approval allowing a start-up company to operate mobile devices in the 6 GHz spectrum band; and,

**WHEREAS**, the resolution detailed how utilities of all kinds—electricity, water, and natural gas—use the 6 GHz band for mission-critical communications needed to maintain grid reliability, including supervisory control and data acquisition (SCADA), teleprotection, and, among others, security; and

**WHEREAS**, that nearly every party in the mobile-devices proceeding opposed the FCC’s decision because of concerns over interference to their communications; and,

**WHEREAS**, the FCC has since, in October 2018, issued a Notice of Proposed Rulemaking<sup>1</sup> into allowing unlicensed use in the 6 GHz band, calling on parties to comment on whether and how to protect incumbent license holders in the band, including electric, water, and natural gas utilities and other critical-infrastructure industries from interference; and,

**WHEREAS**, the FCC proposes to protect incumbents in the band through an Automated Frequency Coordination (AFC) system that proponents of opening up the band believe will ensure that no interference occurs; and,

**WHEREAS**, the AFC is still conceptual and raises many questions about its accuracy, availability, and reliability; and,

**WHEREAS**, the 6 GHz band is already heavily used by utilities, railroads, pipelines and other critical infrastructure industries for essential services, and existing frequency coordination processes make safe and efficient use of the band; and,

**WHEREAS**, allowing additional untried, untested devices in a band well-suited for stationary microwave antennas will undoubtedly cause confusion and interference in the 6 GHz band; and,

**WHEREAS**, utilities have migrated to the 6 GHz band after being forced out of lower bands due to FCC policies. These utilities have invested considerable ratepayer money into developing systems suitable to the 6 GHz band; and,

**WHEREAS**, for some utilities, moving to another band could cost tens of millions of dollars and take a decade to complete, for others, moving to another band is simply not an option; and,

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<sup>1</sup> Unlicensed Use of the 6 GHz Band; Expanding Flexible Use in Mid-Band Spectrum Between 3.7 and 24 GHz <https://www.fcc.gov/document/fcc-proposes-more-spectrum-unlicensed-use-0>

**WHEREAS**, other bands are suitable to the kinds of Wi-Fi and mobile technologies envisioned by the proponents of this proceeding; and,

**WHEREAS**, electric, water, and natural gas utilities are responsible for powering the U.S. economy and lifestyles; any interference to their mission-critical telecommunications systems could threaten their ability to provide reliable and essential utility services.

**NOW, THEREFORE, BE IT RESOLVED**, that the Utilities Technology Council (UTC), gathered at its annual meeting in June 2019, urges the Federal Communications Commission to acknowledge the needs of electric utilities and the other critical infrastructure industries in this proceeding by either abandoning the proposal altogether or providing a viable, tested, and collaborative approach and program to protecting these entities from interference in the band.

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