

FEDERAL ENERGY REGULATORY COMMISSION

WASHINGTON, D. C. 20426

December 18, 2019

The Honorable Ajit Pai  
Chairman  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Chairman Pai,


We write to you concerning the Federal Communications Commission's (FCC) pending rulemaking proceeding (ET Docket No. 18-295) regarding the unlicensed use of the 6 GHz spectrum band. As you can appreciate, reliable and secure communication among electric power system facilities is vital to delivering safe and reliable electricity to all customers. Moreover, communication requirements regarding throughput and reliability are increasing as a result of technological advances at both the Bulk-Power System and distribution levels.

The Federal Energy Regulatory Commission (FERC) continues to examine the cross-dependencies between communications and Bulk-Power System operations. This past June, FERC held its annual reliability technical conference. The technical conference included a panel entitled "Managing Changes in Communications Technologies on the New Grid," which, among other topics, specifically discussed the FCC's proposal on the 6 GHz spectrum band and its potential impacts on Bulk-Power System reliability. The presentations, transcript and post-technical conference comments are accessible through FERC's eLibrary document system in Docket No. AD19-13-000.

As you consider how the FCC will proceed on its 6 GHz spectrum band proposal, we ask that you consider the implications for electric reliability and closely review the rulemaking comments that discuss the potential impacts of the proposal on electric reliability. Many electric utilities use the 6 GHz spectrum band to support their real-time operations, including supervisory control and data acquisition that is used to monitor and control generating units, transmission lines, and substation equipment as well as system protection. The FCC proposed rule seeks to promote unlicensed use of the 6 GHz spectrum band and proposes the deployment of the Automated Frequency Coordination (AFC) system to guarantee that unlicensed devices do not interfere with incumbent users. Therefore, should the proposed rule be adopted, we strongly urge you to consider requests from electric utilities and state regulators for additional testing of the AFC system prior to implementation. We understand the complexity of assessing the cross-


dependencies between areas of critical infrastructure and would be pleased to offer technical assistance through FERC staff if it would be helpful.

Thank you for your attention to this important matter and your continued work on behalf of the American people.

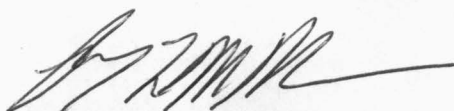


Neil Chatterjee  
Chairman

Sincerely,



Rich Glick  
Commissioner



Bernard L. McNamee  
Commissioner

cc: Commissioner O'Rielly  
Commissioner Carr  
Commissioner Rosenworcel  
Commissioner Starks