Renville Sibley Cooperative Power Association

RENVILLE SIBLEY CO-OP POWER

P.O. Box 68 • Danube, MN 56230-0068
(320) 826-2593 • (800) 826-2593
Fax: (320) 826-2679

RECEIVED & INSPECTED
MAY 07 2002
FCC - MAILROOM

DOCKET FILE COPY ORIGINAL

May 2, 2002

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Office of the Secretary
445 - 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 02-55/Improving Public Safety Communications in the 800 MHz Band; Consolidating the 900 MHz Industrial/Land Transportation and Business Pool Channels

Dear Mr. Canton:

Renville-Sibley Cooperative Power Association (Renville-Sibley) submits these comments in support of those filed by East River Electric Power Cooperative, Inc. (East River) in its letter of May 2, 2002 regarding the FCC Notice of Proposed Rule Making (NPRM) in WT Docket No. 02-55, which seeks to resolve interference complaints in the 800 MHz band.

Renville-Sibley is a rural electric cooperative located in western Minnesota supplying electric service to 1,953 rural member consumers. Renville-Sibley operates more than 1,118 miles of distribution lines and related power facilities to meet the needs of its member systems and is a "small entity" as defined by the Small Business Administration. As part of its operation, Renville-Sibley utilizes the East River Electric 800 MHz trunked radio system for the mission critical mobile communications required for the safe and efficient operation of its power distribution network. This rule making could have a dramatic effect on the future of East River's 800 MHz mobile radio system and consequently on the operation of Renville-Sibley's system.

East River's 800 MHz system was installed in 1994 after an in-depth study of various alternatives available for the replacement of East River's VHF low-band mobile radio system, which had been operational since the early 1950's. This study revealed an 800 MHz wide-area trunked radio system was the only feasible alternative available for providing the "seamless" roaming capabilities and coordinated communications required by East River and its member cooperatives. A search for a possible service provider throughout the service territory revealed no commercial services were available and, in fact, cellular coverage was not available in many areas of our service area.

It has been brought to our attention that the Nextel proposal would have a devastating impact on the users of the East River 800 MHz system. The proposal would necessitate that all Business and Industrial/Land Transportation licensees, as well as Public Safety Pool licensees, move from

No. of Copies rec'd 0+10
List ABCDE

their present assignments in the 800 MHz band. While Nextel proposed to set aside $500 million to pay the costs of relocating public safety licensees from their existing frequencies, no mention is made of the enormous costs of relocating Business and Industrial/Land Transportation licensees, including the users of the East River system. Under the Nextel plan, East River's system could continue to operate on a secondary/non-interference basis on their present frequencies. East River's system users would be forced to either take advantage of guaranteed replacement assignments on a first-come, first served basis or take their chances on future relocation spectrum availability. Users with critical communications requirements, such as those being served by the East River radio system, cannot accept secondary status or afford to take chances on the future of reliable radio communications.

The Nextel proposal seems attractive in that it seeks to eliminate harmful interference to adjacent systems caused by Nextel and cellular carriers' digital systems, and it would create additional traditional Public Safety spectrum. However, it would cause enormous harm to critical infrastructure users - an area of national concern no less important than public safety emergency communications. In the case of the East River system, it may prove to be cost prohibitive to our public safety, local government, cooperative, and small commercial users.

Reducing adjacent-system interference and providing additional traditional Public Safety spectrum are important goals. However, critical infrastructure entities, including electric utilities such as Renville-Sibley, rely on 800 MHz systems for mission-critical control and support of basic services, no less vital than public safety. We are receiving no interference on the East River system and consequently would receive no direct benefit from the proposed rebanding. We join East River Electric Power Cooperative, Inc., the National Rural Electric Cooperative Association and the United Telecom Council in urging the Commission to weigh carefully the impact of the Nextel proposal, as well as other proposals received that would affect any of the critical users of the 800 and 900 MHz bands. Any changes proposed must seek to minimize the impact to not only public safety users, but to the critical infrastructure companies that also provide services vital to every citizen.

Sincerely,

Dale Christensen
CEO

cc: Senator Paul Wellstone
Senator Mark Dayton
Congressman Mark Kennedy
Congressman Collin Peterson

Renville Sibley Cooperative Power Association

RENVILLE SIBLEY CO-OP POWER

P.O. Box 68 • Danube, MN 56230-0068
(320) 826-2593 • (800) 826-2593
Fax: (320) 826-2679

RECEIVED & INSPECTED
MAY 07 2002
FCC - MAILROOM

May 2, 2002

DOCKET FILE COPY ORIGINAL

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
Office of the Secretary
445 - 12th Street, SW
Washington, DC 20554

RE: WT Docket No. 02-55, Improving Public Safety Communications in the 800 MHz Band; Consolidating the 900 MHz Industrial/Land Transportation and Business Pool Channels

Dear Mr. Canton:

Renville-Sibley Cooperative Power Association (Renville-Sibley) submits these comments in support of those filed by East River Electric Power Cooperative, Inc. (East River) in its letter of May 2, 2002 regarding the FCC Notice of Proposed Rule Making (NPRM) in WT Docket No. 02-55, which seeks to resolve interference complaints in the 800 MHz band.

Renville-Sibley is a rural electric cooperative located in western Minnesota supplying electric service to 1,953 rural member consumers. Renville-Sibley operates more than 1,118 miles of distribution lines and related power facilities to meet the needs of its member systems and is a "small entity" as defined by the Small Business Administration. As part of its operation, Renville-Sibley utilizes the East River Electric 800 MHz trunked radio system for the mission critical mobile communications required for the safe and efficient operation of its power distribution network. This rule making could have a dramatic effect on the future of East River's 800 MHz mobile radio system and consequently on the operation of Renville-Sibley's system.

East River's 800 MHz system was installed in 1994 after an in-depth study of various alternatives available for the replacement of East River's VHF low-band mobile radio system, which had been operational since the early 1950's. This study revealed an 800 MHz wide-area trunked radio system was the only feasible alternative available for providing the "seamless" roaming capabilities and coordinated communications required by East River and its member cooperatives. A search for a possible service provider throughout the service territory revealed no commercial services were available and, in fact, cellular coverage was not available in many areas of our service area.

It has been brought to our attention that the Nextel proposal would have a devastating impact on the users of the East River 800 MHz system. The proposal would necessitate that all Business and Industrial/Land Transportation licensees, as well as Public Safety Pool licensees, move from

their present assignments in the 800 MHz band. While Nextel proposed to set aside $500 million to pay the costs of relocating public safety licensees from their existing frequencies, no mention is made of the enormous costs of relocating Business and Industrial/Land Transportation licensees, including the users of the East River system. Under the Nextel plan, East River's system could continue to operate on a secondary/non-interference basis on their present frequencies. East River's system users would be forced to either take advantage of guaranteed replacement assignments on a first-come, first served basis or take their chances on future relocation spectrum availability. Users with critical communications requirements, such as those being served by the East River radio system, cannot accept secondary status or afford to take chances on the future of reliable radio communications.

The Nextel proposal seems attractive in that it seeks to eliminate harmful interference to adjacent systems caused by Nextel and cellular carriers' digital systems, and it would create additional traditional Public Safety spectrum. However, it would cause enormous harm to critical infrastructure users - an area of national concern no less important than public safety emergency communications. In the case of the East River system, it may prove to be cost prohibitive to our public safety, local government, cooperative, and small commercial users.

Reducing adjacent-system interference and providing additional traditional Public Safety spectrum are important goals. However, critical infrastructure entities, including electric utilities such as Renville-Sibley, rely on 800 MHz systems for mission-critical control and support of basic services, no less vital than public safety. We are receiving no interference on the East River system and consequently would receive no direct benefit from the proposed rebanding. We join East River Electric Power Cooperative, Inc., the National Rural Electric Cooperative Association and the United Telecom Council in urging the Commission to weigh carefully the impact of the Nextel proposal, as well as other proposals received that would affect any of the critical users of the 800 and 900 MHz bands. Any changes proposed must seek to minimize the impact to not only public safety users, but to the critical infrastructure companies that also provide services vital to every citizen.

Sincerely,

Dale Christensen
CEO

cc: Senator Paul Wellstone
Senator Mark Dayton
Congressman Mark Kennedy
Congressman Collin Peterson