

Federal Communications Commission
1270 Fairfield Road
Gettysburg, PA 17325

23 September 2002

RE: Alliant Energy Comments on PWC 800 MHz Compromise Plan and
NPRM WT DOCKET NO. 02-55

To whom it may concern:

Alliant Energy is the holding company of Interstate Power and Light Company (IP&L) and Wisconsin Power and Light (WP&L). IP&L provides electric, gas and steam services in Iowa, Minnesota and Illinois. WP&L provides electric, gas and water utility services in Wisconsin. Both subsidiaries have significant operational and financial investments in their 800 MHz wide-area private radio systems, which are operated over more than 120 sites covering over 75,000 square mile of rural service territory.

Alliant faces many geographical, operational and financial challenges in our day-to-day business and relies on its 800 MHz wide-area private radio systems to support our critical infrastructure. Alliant shares many of UTC's concerns with the Private Wireless Coalition (PWC) Compromise Plan and supports the recent NPRM Comments filed by United Telecom Council (UTC).

In addition, Alliant Energy's own concerns are also summarized in the attached Alliant Comments and can be summarized as follows:

- Alliant views the PWC Plan to have competitive and procedural concerns not yet addressed.
- While the PWC Plan may appear to be a proposal by a majority of the 800MHz band, Alliant believes the broadest cross-section of licensees are not represented nor are benefiting by the Plan.
- The PWC Plan affords Nextel an unfair advantage over other commercial wireless carriers.
- The PWC Plan proposes to address "cellularized" site restrictions as a secondary solution to re-banding.
- Alliant Energy finds this re-banding will still create unnecessary interruption of service and heavy expense.
- Instead, Alliant recommends that mandated and enforced use of best practices and technological solutions be implemented.
- Alliant also believes a market-based approach would provide the most inexpensive and effective means to resolve interference without involving other licensees.

Alliant Energy respectfully submits these Comments for the Commission's consideration. If you have any questions please contact me at the below phone number and address.

Thank you for your time and consideration in this matter.

Sincerely,

Lawrence J. Plotzke
Lead Telecommunications Engineer - Mason City Office

larryplotzke@alliantenergy.com

Mason City Ph: 641-422-1748

22 Second St NW

PO Box 481

Mason City, IA 50402-0481

W/attachment

Alliant Energy Comments
PWC COMPROMISE PLAN AND NPRM WT DOCKET NO. 02-55
9/23/02/02

Competitive and Procedural Concerns

- Alliant views the PWC Plan to have competitive and procedural concerns not yet addressed.
- Of the parties involved in the PWC proposal, most stand to gain spectrum, financial compensation and/or cost avoidance from this plan.
- While frequency coordinators and public safety agencies are representing the interests of public safety, other critical infrastructure communications systems are not benefiting from the PWC Plan.
- Alliant respectfully requests the FCC review the true statistics of the number of licensees represented by the PWC. While it may appear to be a coalition of the 800MHz band users, Alliant believes the broadest cross-section of users are not benefiting.
- Alliant is also concerned that apparently only one commercial wireless company stands to benefit from the PWC Plan, Nextel.
 - The PWC Plan affords Nextel an unfair advantage over other commercial wireless carriers by allowing them to acquire a nationwide, contiguous block of replacement spectrum without meeting the competitive bidding requirements of Section 309(j).
 - It is important to reiterate that these NPRM proceedings are in response to Nextel's original proposal to restructure the 800 MHz band to cure interference problems primarily caused by their system(s). The crux of the issue originates with Nextel...Their aggressive inter-category, waiver licensing of the 1990's and subsequent system design and deployment are at the heart of this matter and they should not unfairly benefit through the PWC Plan.

Interference and "Cellularized" Sites

- Alliant acknowledges interference problems are real and a chronic concern, however, the problems are still isolated to highly congested areas and do not affect many licensees. The FCC should conduct an independent study of the interference claims before imposing any relocation and re-banding solution.
- While Alliant agrees any FCC ruling must address eliminating interference between high-power, low-site transmissions and low-power, high-site receivers, the PWC Plan does not go far enough and only addresses "cellularized" site restrictions as a secondary solution to re-banding.
- The PWC Plan's main focus is to implement a broad, over-reaching, re-banding solution that only removes the responsibility of Nextel to resolve its specific interference problems, which were the original catalyst of this NPRM.
- Instead, Alliant recommends that mandated and enforced use of best practices and technological solutions be implemented.
 - The FCC should establish rules and processes to:
 - Require the use of cavity filters to prevent intermodulation and spurious emissions.
 - Tighten standards on emissions masks.
 - Define receiver standards that supports the "Class A" standards in TIA/EIA-603-A
 - Catalog and identify potential sources of interference.
 - Clarify the methods and responsibilities of each party to resolve interference.
 - Establish timelines and arbitration to ensure resolution of interference.

Rule Making Considerations

- Alliant Energy finds that re-banding will create unnecessary interruption of service and heavy expense.
- Alliant also views the PWC plan as risking the availability of sufficient spectrum, while not proving definitive benefits to Alliant Energy and other utility incumbents.
- Alliant believes a market-based approach would provide the most inexpensive and effective means to resolving interference without involving other licensees. Exchanging/trading of channels should be allowed and inter-category restrictions eliminated for the purpose of interference resolution and effective frequency reuse.
- Should the FCC still find re-banding to be necessary and/or use the PWC Plan as the basis for its final rule making, Alliant respectfully requests the FCC consider the following:
 - Those licensees that initially caused the 800 MHz interference problems and/or those that stand to gain from the relocation should ONLY burden the relocation costs.
 - **Both** public safety and critical infrastructure licensee's need adequate, interference-free spectrum to ensure reliable communications during states of emergency. The FCC must provide measures to preserve the ability to meet current and future spectrum needs of critical infrastructure, including utilities.
 - The FCC should define technical standards and best practices for those licensees staying in the 800 MHz band?
 - The FCC should address the impact to licensing and deployment of future private digital, wide-area systems, such as private iDEN?
 - As Proposed in the PWC Plan, the 5-year "preferential" period, for Public Safety agencies to apply for vacated spectrum is too restrictive. Alliant requests the FCC consider a predefined, public notice, waiver process for eligible parties to request this spectrum.
 - The PWC Plan does not address the band plan as it relates to the Mexico and Canadian borders. The FCC should define how the spectrum in these areas of the country will be addressed
 - Nextel Involvement and Funding
 - It is not clear how the PWC Plan affects Nextel affiliates. The FCC should consider the far-ranging system makeup of the "Nextel System" and how these affiliates are germane to any final frequency and financial/payment solution.
 - The \$500 Million Nextel has committed to move Public Safety licensees will not be enough. Where will the additional funding come from for those who need to relocate?
 - What is the FCC's ability to enforce Nextel to pay the \$500 Million? Is there a scenario in which Nextel may not accept the FCC's final ruling, possibly appealing and thus causing possible delays in the relocation efforts and payments?
 - What is the fair and equitable relocation and spectrum dollars Nextel should pay in "trade" for the spectrum they may gain?