**DCN 16-15-0039-00-Gcon**

**4) Contributions expressing interest in such a standard**

BPC Spectrum LLC holds Upper 700 MHz A Block FCC Spectrum Licenses that cover just over one-half of the population of the U.S. Select Spectrum LLC has been retained by BPC Spectrum to market the licenses for sale or lease by electric, gas water and wastewater utilities as well as to other critical infrastructure organizations involved in the production and distribution of energy.

BPC Spectrum and Select Spectrum have reviewed the draft PAR with the suggested changes and support moving forward without further changes.

BPC Spectrum and Select Spectrum support the 802.16 narrow channel standardization process. BPC Spectrum and Select Spectrum believe the best use of the Upper 700 MHz A Block is to support critical communications requirements of the industries mentioned above.

We believe there is a substantial market for a standards-based products based on the following points:

* Select Spectrum has marketed and assisted in the multi-million dollar sale of BPC Spectrum FCC licenses to Portland General Electric. We believe PGE plans uses consistent with the planned standard.
* Select Spectrum has held spectrum sales-related discussions with many other large utilities and energy companies. In each case, the organization was interested in using BPC’s spectrum licenses for applications consistent with the proposed standard.
* BPC Spectrum, the other two long-term holders of Upper 700 MHz A Block Spectrum Licenses, the Utilities Telecom Council and several equipment manufacturers have signed a consortium document recommending the use of the Upper 700 MHz A Block for applications consistent with the proposed standard.
* Telephone companies are discontinuing traditional wired copper and landline services, and their replacement “Fiber Ethernet” services are much more expensive and frequently unavailable in locations required by utilities and energy companies.
* Utilities often prefer wireless communications, since the grounding requirements of their locations make the use of landline services – especially copper based services – expensive and/or complicated.
* For good business reasons, utilities and other mission critical entities continue to require increased capacity for their private, licensed radio networks.
* Unlicensed frequencies and commercial wireless networks suffer from limitations including limitations in reliability, security, capacity, range and coverage.
* The incremental cost to implement a private wireless data networks is moderate given that utilities already have existing private land mobile radio infrastructure including towers and backhaul. The cost to establish private wired or fiber networks is generally much higher.
* Unlicensed wireless networks are not suitable for mission critical application due to potential interference and power restrictions.
* 1 MHz licensed channels are readily available for purchase from BPC Spectrum and the other Upper 700 MHz A Block license holders and capable of meeting the capacity requirements of a private wide area network.
* SDR technology and other readily available technologies can easily support the requirements.

While there are a few candidates for available spectrum to support this standard, BPC Spectrum and Select Spectrum believe that the Upper 700 MHz A Block will prove to be the preferred band for critical infrastructure use of equipment meeting the standard. BPC Spectrum and Select Spectrum will support the standard and are ready to sell or lease their spectrum licenses to utilities at moderate cost. We believe that the cost of many such wireless projects can be easily covered by cost savings from operational efficiency improvements. Further, we believe the use of the standard can improve the reliability of utility service, support new technologies, regulations and utility market structures and even reduce the production of greenhouse gases.