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June 18, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Comment on WT Docket No. 19-116
In the Matter of Allocation and Service Rules for the 1675-1680 MHz Band

Dear Secretary Dortch:

Established in 1959, the Interstate Council on Water Policy (ICWP) is the national organization of state, interstate, regional and local water resources agencies - the nation's water managers. Within this context, I am writing to express concern that interruptions and frequency interferences that impact the collection, transmittal, real-time data accessibility and general functionality of the Geostationary Orbiting Environmental Satellites GOES Data Collection System will be detrimental to non-federal agencies charged with water resources management, natural resource protection and public health and safety responsibilities. The ICWP is opposed to the allocation of the 1675-1680 MHz band for terrestrial mobile use. Any potential inference with operation of the GOES system threatens our understanding and management of the nation's water resources.

Our member organizations all rely on the availability of consistent, reliable and timely water data. The acquisition of hydrologic data from monitoring sources operated by the federal government as well as non-federal entities depend on the GOES Data Collection System to support critical water management decisions. ICWP is very concerned that powerful transmissions in bands adjacent to the relatively weak satellite download bands may compromise the ability of the GOES system to download information in a timely manner

Real-time information (in many cases transmitted every 15 minutes) from these gages are used to make critical hour-by-hour water administration decisions. The ability to accurately track water volumes, especially during times of crises such as floods or hurricane events has life-threatening implications. I refer you to the comment letters submitted by two of

Leader in Water Policy Information, Influence and Implementation

our member states, Nebraska and Wyoming. Hundreds of non-federal monitoring stations rely upon the GOES system in states nation-wide. Disruptions to these transmissions could be costly in human life during a flood or hurricane event.

An option being proposed by the commercial interests who stand to gain from the re-purposing of this bandwidth claim that these water data can be transmitted via cloud or other internet-based systems. Many gaging stations and other monitoring equipment are located in remote areas lacking cell service. More importantly, during floods, hurricanes, tornadoes or other natural disasters, internet connections cannot be relied upon and these are the times when accurate transmission of water volumes is most crucial.

In summary, reallocation of the GOES system 1675-1680 MHz bandwidth for terrestrial mobile use will adversely affect the ability to manage the water resources of our nation. Our members respectfully request that you reject this proposal based on the public safety and water resources management implications.

Thank you for the opportunity to provide input on this critical matter.

With best regards,

A handwritten signature in black ink that reads "J. Brian Atkins". The signature is written in a cursive style with a large, stylized initial "J".

J. Brian Atkins, Chair
Interstate Council on Water Policy