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

Re: Higher Ground LLC, Blanket License Application for C-band Mobile Earth Terminals, IBFS File No. SES-LIC-20150616-00357

April 27, 2017

Dear Ms. Dortch:

Basin Electric Power Cooperative is writing to support the Applications for Review filed in the above matter regarding the waiver granted to Higher Ground LLC to operate C-band Mobile Earth Terminals.

Basin Electric is a generation and transmission cooperative based in Bismarck, North Dakota. We serve more than three million consumers through 141 rural electric cooperatives across nine states. We own 2,185 miles of transmission and maintain 2,349 miles of high-voltage transmission across 76 switchyards and 189 telecommunication sites.

We share the concerns raised by many utilities about Higher Ground’s plans to operate in the 5925-5425 MHz (6-GHz) band. Basin Electric and several of its members operate critical communications systems within the 6-GHz band, including protective relaying of its high voltage transmission system. The risk of interference from Higher Ground’s services could seriously undermine the reliability of the electric grid as well as present a safety hazard to personnel who use and maintain it. The burden of proof is on Higher Ground to show that its operations will not interfere with these and other 6-GHz services, and we believe that burden has not been met. Moreover, there are no provisions in the waiver that would hold Higher Ground accountable for any interference it may cause.

As cooperatives that serve millions of rural Americans, we commend efforts to expand Internet access, especially with the widespread adoption of smartphones and smart devices that are becoming an integral part of daily life. However, a blanket license to operate in the 6 GHz band is not the way to achieve that. We urge the FCC to grant the Applications for Review and take another look at Higher Ground’s application and to work with industry to find a solution that will improve Internet communication for rural Americans and protect the electric grid.

Thank you for your consideration of these comments.

Sincerely,

Mark D. Foss
Senior Vice President and General Counsel

imf/clv