



**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

900 Seventh Street, NW
Washington, DC 20001
202.833.7000
www.ibew.org

LONNIE R. STEPHENSON
International President

KENNETH W. COOPER
International
Secretary-Treasurer

February 7, 2020

VIA EMAIL

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: In the matter of Unlicensed Use of the 6 GHz Band (ET Docket
No. 18-295) In the matter of Expanding Flexible Use in Mid-Band
Spectrum Between 3.7 and 24 GHz (GN Docket No. 17-183)**

Dear Chairman Pai:

On behalf of the 775,000 active and retired members of the International Brotherhood of Electrical Workers (IBEW), I am writing to share IBEW members' opposition to the Federal Communications Commission's (FCC) *Notice of Proposed Rulemaking* regarding unlicensed use of the 6 GHz band. The IBEW is deeply concerned over the potential impact the proposed rulemaking will have on the safety and livelihood of our members and the communities they serve.

Over half of IBEW members work in critical-infrastructure industries (CII), including electrical, gas and water utilities, telecommunications and transportation. Within the utility sector, highly skilled and experienced IBEW members work daily as outside linemen, electrical grounds-men technicians, equipment operators, mechanics, substation electricians and communications technicians who build, operate and maintain our nation's electrical grid and water and gas delivery systems.

The IBEW represents tens of thousands of workers in the telecommunications sector who are involved in the installation, maintenance, and operation of almost all of the communications systems that American consumers rely on. All phases of this industry—from fabrication and construction to product maintenance and public safety services—depend on special radio, satellite, and TV links. IBEW personnel are employed in maintenance and repair work essential to modern, efficient telecommunications.

IBEW members, in addition, are heavily involved in the installation and maintenance our nation's electrical and communications systems on freight, commercial and passenger rail, including positive train control, (PTC), a system designed to prevent train-to-train collisions, derailments caused by excessive speeds and unauthorized train movements in work zones.





**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

900 Seventh Street, NW
Washington, DC 20001
202.833.7000
www.ibew.org

LONNIE R. STEPHENSON
International President

KENNETH W. COOPER
International
Secretary-Treasurer

The Honorable Ajit Pai
February 7, 2020
Page 2

IBEW members within these CII industries install, operate and maintain communications in the 6 GHz band that are used to protect members and the communities they serve, in addition to providing essential services for businesses and consumers. The 6 GHz system is used for transmission, substation and distribution grid work for critical electric and gas infrastructure. IBEW members rely on the uninterrupted communications provided by this system to open, close and repair high voltage devices and all associated worker safety applications in connection with the electric grid. Any interruption of communications between system dispatch and the crews while performing hazardous work could result in serious injury up to including death for high electric voltage and gas workers.

In particular, the IBEW is concerned about the proposed use of the Automated Frequency Coordination (AFC) system for protecting members and public safety from interference. The AFC is theoretical in nature and has not been proven to work in real-life scenarios where extremely high standards of reliability – 99.999 percent or higher – are critical for the safety of IBEW members and the general public. Any changes to the 6 GHz spectrum band must protect the safety and reliability of the grid and workers who rely on this band.

The IBEW supports the FCC using its authority to promote unlicensed wireless use within available spectrum and the wider implementation of 5G wireless services. In fact, thousands of IBEW members are employed or contracted by telecommunications providers that are currently deploying 5G networks across the United States. I hope that additional 5G deployment and more enhanced services will provide additional work opportunities for current and future IBEW members. The IBEW further recognizes the importance of the United States being the international leader in wireless innovation and 5G deployment. However, 5G deployment and unlicensed use of spectrum cannot overshadow the need to protect incumbent communications services currently provided in the 6 GHz band.

The IBEW respectfully requests consideration of other spectrum bands, outside of the 5.925-7.125 GHz band, that could be utilized to increase unlicensed use and not risk interference with incumbent electrical, gas and water utility, telecommunications and transportation users. There are numerous reasonable alternatives for unlicensed operation on other bands while the 6 GHz band is uniquely suited for and heavily used by public safety providers and incumbent CII users.

For over 127 years, safety has remained a hallmark of the IBEW. The work for IBEW members and the systems they maintain pose inherent hazards. The safety of members and the public is our most solemn commitment, and the uninterrupted communications between system dispatch and crews performing work is vital for worker safety. The IBEW urges the FCC to reserve the 6 GHz band to only critical-infrastructure industries that provide safe, secure and reliable essential services to the public.





**INTERNATIONAL
BROTHERHOOD
OF ELECTRICAL
WORKERS®**

The Honorable Ajit Pai
February 7, 2020
Page 3

For the reasons stated above, the IBEW urges the FCC to proceed with caution and address the potential risks to workers in incumbent CII industries that rely on the 6 GHz band. Thank you for the opportunity to provide our comments on the important work of the FCC.

Sincerely yours,

Lonnie R. Stephenson
International President

LRS:mlm

