

Southern Communications Services, Inc. d/b/a Southern Linc

Statement in Support of Experimental License Application

Pursuant to Section 5.61(b) of the Rules of the Federal Communications Commission (“FCC” or “Commission”), Southern Communications Services, Inc. d/b/a Southern Linc (“Southern Linc”) hereby provides this narrative statement in support of its application for special temporary authority (“STA”) to conduct technical trials using spectrum in the 896-901/935-940 MHz band from a specified location in Alabama in accordance with the technical and operating parameters described in the accompanying STA application. Southern Linc requests STA for a period of six (6) months from grant of this application.

I. BACKGROUND

Southern Communications Services, Inc. d/b/a Southern Linc (“Southern Linc”) operates a commercial digital 800 MHz ESMR system that uses an all-LTE platform to provide interconnected voice, dispatch, push-to-talk, text and picture messaging, internet access, and data transmission services over the same handset. Southern Linc provides these services over a 122,000 square mile service territory covering Georgia, Alabama, and southeastern Mississippi.

Southern Linc is a wholly owned subsidiary of Southern Company, a holding company based in Atlanta, Georgia, which operates 7 regulated utilities serving 9 million customers in six states. Southern Company owns three electric utility subsidiaries – Alabama Power Company, Georgia Power Company, and Mississippi Power Company – which provide retail and wholesale electric service throughout a 100,000+ square mile service area in Alabama, Georgia, and Mississippi. Southern Company supplies wholesale electric power to municipalities, rural electric cooperatives, and other distribution providers through its Southern Power subsidiary, which operates natural gas, solar, wind, and biomass generating facilities in 15 states. Southern Company Gas provides natural gas distribution and storage in four states: Illinois, Georgia, Tennessee, and Virginia.

As a subsidiary of Southern Company, Southern Linc directly and indirectly supports the internal communications needs of its affiliated electric utility operating companies, which include not only mobile services but also fixed point-to-point and fixed point-to-multipoint wireless services for a variety of applications that support the safe, reliable, and efficient delivery of essential electric utility services, such as monitoring, load management, protective relaying, and supervisory control and data acquisition (“SCADA”) systems.

II. OVERVIEW

Southern Linc uses its 800 MHz LTE network for various applications in support of its affiliates’ electric and gas utility operations. These applications include Advanced Meter Infrastructure (“AMI”) backhaul, SCADA, remote engineering access, telephony, push-to-talk,

fault monitoring, and general workforce mobility applications. Southern Linc currently uses a 3/3 megahertz LTE channel to provide these services.

In 2020, the Commission adopted a Report and Order realigning the 896-901/935-940 MHz band (“900 MHz band”) to create a 3/3 megahertz allocation in the band to facilitate broadband deployment for business enterprise entities, including those classified as Critical Infrastructure Industry.¹ The Commission considered a 5/5 megahertz broadband segment, but did not adopt it at that time due to the need for continued narrowband operations and to observe the interference environment in adjacent bands after broadband deployment.² On February 28, 2024, a group of entities representing utility and enterprise interests filed a Petition for Rulemaking requesting that the Commission modify its rules to provide for an optional, expanded 5/5 megahertz broadband segment in the 900 MHz band.³ On April 2, 2024, the Commission’s Wireless Telecommunications Bureau released a Public Notice requesting public comment on the Petition’s proposals in WT Docket No. 24-99.⁴

In order to evaluate the technical viability and capability of the Petition’s proposed optional 5/5 megahertz broadband segment in the 900 MHz band, as well as to evaluate potential interference to systems operating on adjacent bands, Southern Linc seeks an experimental license to use 900 MHz channels currently licensed to PDV Spectrum Holding Company, LLC (“PDV”) as proposed in this application in Tallapoosa, Chambers, and Lee Counties in Alabama.

III. REQUEST FOR SPECIAL TEMPORARY AUTHORITY

A. Purpose of Test

Southern Linc requests STA to test LTE equipment on spectrum in the 900 MHz band for the purpose of conducting technical radio research. In particular, this testing is intended to confirm whether a broadband service of up to 5/5 megahertz can be deployed on 900 MHz band spectrum using LTE-certified Band Class 8 equipment without causing interference to systems operating on the adjacent Narrowband PCS band at 901-902/940-941 MHz. Southern Linc notes that its affiliates operate an extensive AMI system on the Narrowband PCS band that must be protected from interference.

The testing will be conducted on 900 MHz channels currently licensed to PDV on an MTA basis (with the consent of PDV) and on interleaved B/ILT channels. The adjacent-band AMI system that may potentially be affected by this testing is operated by Southern Linc’s affiliate Southern Company Services, Inc. (“SCS”) on Narrowband PCS spectrum licensed to SCS, who consents to and will be participating in the testing. The testing will comply with

¹ / *Review of the Commission’s Rules Governing the 896-901/935-940 MHz Band*, WT Docket No. 17-200, Report and Order, Order of Proposed Modification, and Order, 35 FCC Rcd 5183 (2020) (“900 MHz Order”).

² / *Id.* at 5198, para. 33.

³ / Petition for Rulemaking of Ameren Services Company, et al., RM-11977 (filed Feb. 28, 2024) (“Petition”).

⁴ / “Wireless Telecommunications Bureau Seeks Comment on Petition for Rulemaking to Expand Wireless Broadband in 900 MHz Band,” Public Notice, WT Docket No. 24-99, RM-11977 (rel. April 2, 2024).

Section 5.84 of the Commission's Rules and will not cause interference to either co-channel or adjacent channel licensees authorized pursuant to the current 900 MHz band plan.

B. Technical Parameters of Test

The testing will involve wireless connectivity to fixed and mobile locations within the listed radius of the transmitter site. Details on the Ericsson transmitting equipment to be used in this testing are provided in the technical sections of this application. It should be noted that this is equipment is experimental only to the extent that it has not yet been certified for use on Part 90 spectrum; the model that Southern Linc plans to test is certified LTE Band Class 8 equipment that has been deployed worldwide at 900 MHz. Southern Linc plans to deploy one directional antenna at the site, the details of which also are provided in the technical section of this application.

As with standard field area network systems, the testing of the fixed wireless LTE equipment will be automated to transmit intermittent information from the site specified in this application. While most of the monitored testing would take place during normal business hours (8:00 AM – 5:00 PM local time), Southern Linc anticipates that data transmissions will occur throughout the 24-hour day. Consistent with the requirements of Section 5.107 of the Commission's Rules, system management and monitoring will be handled remotely from Southern Linc's offices at Birmingham, Alabama, except for installation, setup, and any equipment adjustments that will be conducted by qualified personnel on site.

Southern Linc requests STA for a period of six (6) months for a valid equipment evaluation and performance trial and to make adjustments to the testing as needed.