Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
4545 12th Street, SW  
Washington D.C. 20554

RE:  ET Docket No. 10-123

Dear Ms Dortch:

The Association of State Floodplain Managers (ASFPM) is very concerned about the proposed reallocation of 1675-1710 MHz frequencies from their current public domain use.

Our concern is based on the critical need for reliable, real-time data from the nation’s stream gages for warning systems and public safety. The U.S. Geological Survey (USGS) maintains a network of fully funded gages through the National Streamflow Information Program (NSIP) and through a system of cooperatively (federal and local) funded gages. The information provided to the USGS and other federal, state and local entities is essential for forecasting, storm and flood advisories and warnings, management of water flows and releases as well as regulating and permitting associated with water resources. The data is used to support substantial federal investment in flood hazard identification and flood hazard mitigation.

The National Oceanic and Atmospheric Administration (NOAA) Geostationary Operational Environmental Satellites Date Collection System (GOES DCS) is the primary means of transmitting the data. In storm or disaster situations, there is often a loss of internet access so the reliability of radio frequencies for real-time data transmission becomes essential for protection of life and property. Private back-up systems cannot be counted on for such key public service functions.
The ASFPM and its 29 State Chapters represent over 14,000 state and local officials and other professions engaged in all aspects of floodplain management and Hazard mitigation, including management, mapping, engineering, planning, community development, hydrology, forecasting, emergency response, water resources and insurance for flood risk. All ASFPM members are concerned with working to reduce our nation’s flood-related losses. We appreciate the opportunity to register our great concern about the potential loss of reliable radio frequency transmission for essential real-time water-related data.

Sincerely,

Greg Main           Larry Larson
ASFPM Chair         ASFPM Executive Director