June 24, 2010

Dear Ms. Dortch:

On behalf of the New York State Floodplain and Stormwater Managers Association, I am writing to oppose reallocation of the 1675 to 1710 MHz frequencies, which are utilized by the NOAA GOES weather satellite downlink to transmit data that are critical for protecting life and property.

The GOES Data Collection System is currently a reliable system for transmitting real-time stream gauge data from hundreds of US Geological Survey (USGS) stations in New York. During flood events, our members rely on this real-time gauge information, as well as the National Weather Service flood forecasts based on these data. We are concerned that sharing of this bandwidth could slow down or disrupt transmission of critically important stream flow information. The Internet and other ground-based distribution services are subject to disruption during floods and thus cannot be considered “functionally equivalent substitutes” for the use of these frequencies.

USGS stream gauges have repeatedly been threatened with discontinuation due to insufficient funding. Changes to the data transmission frequency for this gauge system could lead to additional costs to replace or modify individual stations. This would divert limited resources away from system operations and would likely result in a reduction in the availability of real-time stream flow information.

The GEOS system is also used by the National Weather Service to distribute warnings and other information. Any loss or degradation to this system would thus impact local emergency management and public warning systems, compromising public safety.

The proposed reallocation of the GOES frequency would result in increased vulnerability and/or increased cost for the transmission of data that are critically important for flood forecasting and warning. This is information that people need! Any reduction in this information is likely to cost lives and result in increased flood damages. We thus request that the 1675-1710 MHz frequencies remain in the public domain and be preserved for the transmission of environmental data.

Sincerely,

Shane Nickle, Chair

Janet Thigpen, Policy Committee Chair

NYS Floodplain and Stormwater Managers Association