

May 23, 2016

VIA ELECTRONIC MAIL

Attn: IOT RFC 2016

National Telecommunications and Information Administration

U.S. Department of Commerce

1401 Constitution Avenue, N.W.

Room 4725

Washington, D.C. 20230

iotrfc2016@ntia.doc.gov

Re: Docket No. 160331306-6306-01 – National Telecommunications and Information Administration Request for Public Comment on The Benefits, Challenges, and Potential Roles for the Government in Fostering the Advancement of the Internet of Things

Southern Company Services, Inc., as agent for and on behalf of operating affiliates Alabama Power Company, Georgia Power Company, Gulf Power Company and Mississippi Power Company (collectively, “**Southern Company**”), is pleased to have this opportunity to respond to the National Telecommunications and Information Administration’s (“**NTIA**”) request for public comment on The Benefits, Challenges, and Potential Roles for the Government in Fostering the Advancement of the Internet of Things (“**Request for Comment**”).

As one of the premier energy companies serving the southeastern United States, Southern Company is a leading U.S. producer of nearly 46,000 MW of safe, reliable and affordable energy to approximately 4.4 million customers across a 120,000 square mile territory in Alabama, Florida, Georgia and Mississippi. Southern Company has invested billions of dollars over several years to build and maintain a smarter, more robust transmission and distribution system, including the application of electronic devices such as smart grid technologies. Southern Company recognizes the importance of encouraging innovation and protecting consumer privacy and critical infrastructure assets while maintaining reliable, affordable electric service. Southern

Company brands are known for energy innovation, excellent customer service, high reliability and retail electric prices below the national average. In April 2015, Southern Company created a consumer-focused energy innovation hub to continue the legacy of energy innovation that has fueled Southern Company's excellent customer service and reliability.

In light of the foregoing, Southern Company welcomes the emergence of the innovative Internet of Things (“**IoT**”) market, and strongly encourages the involvement of all IoT stakeholders in defining how IoT should further evolve, including, without limitation, through the division or classification of the IoT landscape, the creation of standards or regulatory frameworks, and implementation of security protocols.

Southern Company understands that IoT cuts across many segments of the economy and presents various challenges. IoT is a market still in infancy and, as such, lacks standard processes or protocols which contribute to and increase privacy and cybersecurity concerns. Despite such challenges, Southern Company believes that IoT can grow the economy. IoT promises to create jobs, provide a better quality of life for society – including increased individual productivity – and provide for better allocation of personal and business resources.

Further, Southern Company recognizes and appreciates the benefits that could be realized from a standard platform for IoT, as a standard platform would diminish the risk of ever-evolving protocols and wasted asset investment, and would encourage an energy company such as Southern Company to make utility-scale investments in IoT (or a significant actor in another related industry to make substantial capital investments). For purposes of example, current infrastructure may not be set up properly to handle IoT demands – an AMI network (an infrastructure for gathering and disseminating information at a utility meter) built for a customer billing process may not have the bandwidth to handle connected devices and homes or

businesses without significant and costly upgrades. To invest in such upgrades prudently, utilities would likely need to be confident that they were deploying resources for long-term assets.

Notwithstanding the foregoing, in developing any standard platform or in the development of any regulatory framework, Southern Company supports balancing the concern for privacy and national security against a need to foster economic development by creating jobs and increasing productivity of American citizens and workers, including considering the costs and burdens on American business to implement any such framework or protocol. Southern Company also strongly encourages the involvement of the appropriate stakeholders in the creation of any ultimate rules, as those stakeholders are in the best position to perform the risk/benefit-based analysis the IoT requires and will provide meaningful perspective on how to address the challenge of the emerging IoT market.

Southern Company appreciates the opportunity to respond to NTIA's request for public comment and looks forward to participating further in the ongoing discussion surrounding IoT.

Respectfully submitted,

SOUTHERN COMPANY
/s/ Kenneth C. Shiver /
Kenneth C. Shiver,
Planning & Regulatory Support
Director

Lori E. Morris,
Senior Attorney

Southern Company Services, Inc.
30 Ivan Allen Jr. Boulevard
Atlanta, Georgia 30308
(404) 506-0467
lemorris@southernco.com