

December 21, 2015

Roberto Mussenden  
Public Safety Homeland Security Bureau  
Federal Communications Commission  
RE: Updated South Sound 911 Waiver Request

Dear Mr. Mussenden,

On October 28, 2014, the FCC granted Public Safety agencies in Pierce County, WA a waiver for an extension of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. Since the time the waiver was granted important schedule developments have occurred. At this time South Sound 911 (SS911) would like to report significant progress that has been made since the waiver was granted, provide the FCC with an updated schedule for narrowbanding, and request an additional extension of time for completing the narrowbanding process.

SS911 has been working with Public Safety agencies within Pierce County to coordinate efforts in developing regional interoperable radio communications networks that will provide effective and efficient communications well into the future. The overall regional plan is for agencies to operate in a P25 700/800 MHz trunking environment for day-to-day operations and operate a limited number of narrowband VHF/UHF resources as a regional Mutual Aid overlay system. Some agencies will maintain separate VHF/UHF resources to meet specific requirements and/or for backup systems. In addition, Pierce County is deploying a 3-site narrowband VHF simulcast system along the highway 410 corridor to replace existing wideband operations and expand coverage.

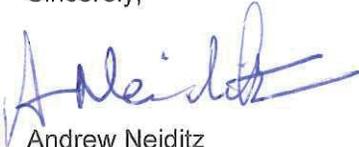
As of today, all major public safety agencies in Pierce County are operating on P25 700/800 MHz trunked radio systems on a daily basis. In addition, agencies have narrowband capable multi-mode/multi-band subscribers deployed throughout the county that can be utilized for narrowband VHF operations. As users have transitioned to trunked operations, unused VHF and UHF channels are planned to be decommissioned once the new narrowband VHF systems are in place.

The county-wide VHF overlay system is funded and completely designed. However, the system implementation has been delayed due to longer than expected design review process and construction issues during winter weather. Two FCC applications have been submitted for the overlay system. One has granted and the other is in process with the FCC pending Canadian coordination. As construction at higher elevation sites becomes difficult in winter months, implementation is not expected to be complete until summer 2016. The highway 410 VHF system has two out of the three sites constructed and is fully licensed. The third site was delayed due to third party leasing issues, which pushed the construction timeline into the winter access months. Due to the high elevation and mountainous terrain, winter access is very difficult and has delayed the completion of the radio system.

As a result, SS911 would like to request an additional twelve months, until December 31st 2016 to allow for the completion of the county-wide overlay and highway 410 systems and to allow agencies to gracefully decommission systems no longer in use. An updated schedule has been provided as Attachment A. Call signs and frequencies to be included in the waiver are provided as attachment B. In addition, on April 15 2013 a waiver of the prohibition of the manufacture and import of wideband (25 kHz) capable equipment was granted to SS911. At this time, South Sound 911 also seeks the same extension of the waiver for prohibition on behalf of its manufacturer Motorola Solutions, Inc. (MSI), as well as, all future manufacturers to allow them to sell SS911 multi-mode and multi-band (VHF, UHF and 700/800 MHz) radios. SS911 will continue to purchase and deploy these radios, which can operate using 25 kHz or 12.5 kHz bandwidth (dual-mode), on the existing VHF/UHF system, and retain interoperability transitioning to the new 700/800 MHz system.

Pursuant to C.F.R Part 1, Section 1.925, the public's best interest will ultimately be served since this will allow Public Safety agencies in Pierce County to operate on their existing wideband VHF/UHF channels throughout the deployment and transition phases associated with the new systems, without having to invest public money in temporarily narrowbanding equipment that will be decommissioned in the near future.

Sincerely,



Andrew Neiditz  
Executive Director  
South Sound 911

## **Attachment A**

### **Updated Schedule**

#### Planned Narrowbanding Schedule

**October 2014:** Majority of users transitioned over to new P25 radio systems for day-to-day operations.

**December 31 2014:** Narrowband capable subscriber equipment deployed for overlay VHF system (multi-band radios).

**January-December 2015:** Finalize site selection, and complete design for VHF overlay system to include required Mutual Aid and backup systems for Law Enforcement and Fire agencies in Pierce County area. Begin the implementation of the county-wide narrowband VHF overlay system.

**January-September 2016:** Complete implementation the new narrowband VHF system overlay for sites that were delayed due to inclement weather.

**September-December 2016:** Decommission of wideband VHF systems. Perform final system acceptance, and turn in VHF channels that are no longer utilized.

## Attachment B

<b>Entity</b>	<b>FRN</b>	<b>CALL SIGN</b>	<b>FREQUENCY</b>
Pierce County	6060149	KAW630	153.8900
Pierce County	6060149	KAW630	154.3550
Pierce County	6060149	KB86231	458.7875
Pierce County	6060149	KB87344	453.3125
Pierce County	6060149	KC3711	154.9500
Pierce County	6060149	KC3711	155.3700
Pierce County	6060149	KC3711	156.0900
Pierce County	6060149	KD39671	458.3125
Pierce County	6060149	KD39983	453.7875
Pierce County	6060149	KDL938	153.8900
Pierce County	6060149	KDL938	154.3550
Pierce County	6060149	KDL938	460.2250
Pierce County	6060149	KDL938	460.5000
Pierce County	6060149	KDL938	463.0000
Pierce County	6060149	KDL938	463.0250
Pierce County	6060149	KDL938	463.0500
Pierce County	6060149	KDL938	463.0750
Pierce County	6060149	KDL938	463.1000
Pierce County	6060149	KDL938	465.2250
Pierce County	6060149	KDL938	465.5000
Pierce County	6060149	KNDB840	468.0000
Pierce County	6060149	KNDB840	468.0250
Pierce County	6060149	KNDB840	468.0500
Pierce County	6060149	KNDB840	468.0750
Pierce County	6060149	KNDB840	468.1000
Pierce County	6060149	KOB452	154.9500
Pierce County	6060149	KOB452	155.3700
Pierce County	6060149	KOB452	156.0900
Pierce County	6060149	KOL566	453.2250
Pierce County	6060149	KOL566	458.2250
Pierce County	6060149	KYD943	154.9500
Pierce County	6060149	KYD943	156.0900
Pierce County	6060149	KYY938	453.6250
Pierce County	6060149	KYY938	453.8750
Pierce County	6060149	KYY938	458.6250
Pierce County	6060149	KYY938	458.8750
Pierce County	6060149	WNAG888	156.2400
Pierce County	6060149	WNFD631	154.9500
Pierce County	6060149	WNFD631	156.0900
Pierce County	6060149	WNJB884	155.6100
Pierce County	6060149	WNJB884	158.9100
Pierce County	6060149	WNJJ410	159.0300
Pierce County	6060149	WPIJ509	151.3550
Pierce County	6060149	WPIJ509	156.0600
Pierce County	6060149	WPPX942	154.9500
Pierce County	6060149	WPPX942	155.6100

<b>Entity</b>	<b>FRN</b>	<b>CALL SIGN</b>	<b>FREQUENCY</b>
Pierce County	6060149	WPPX942	156.0900
Pierce County	6060149	WPRG300	151.3550
Pierce County	6060149	WPRG300	154.9500
Pierce County	6060149	WPRG300	155.6100
Pierce County	6060149	WPRG300	156.0600
Pierce County	6060149	WPRG300	156.0900
Pierce County	6060149	WPRG300	156.2400
Pierce County	6060149	WPRG300	158.9100
Pierce County	6060149	WPRG300	159.0300
Pierce County	6060149	WPRG300	453.6250
Pierce County	6060149	WPRG300	453.8750
Pierce County	6060149	WPRG300	458.6250
Pierce County	6060149	WPRG300	458.8750
Pierce County	6060149	WPXB748	155.6100
Pierce County	6060149	WPXB748	156.0900
Pierce County	6060149	WPXB748	158.9100
Pierce County	6060149	WPYI897	154.3250
Pierce County	6060149	WPYI897	154.9500
Pierce County	6060149	WPYI897	159.0300
Pierce County	6060149	WPZB949	153.8900
Pierce County	6060149	WPZB949	154.3250
Pierce County	6060149	WPZV503	156.2400
Pierce County	6060149	WPZV507	156.2400
Pierce County	6060149	WQBD245	156.2400
Pierce County	6060149	WQDN364	154.9500
Pierce County	6060149	WQDN364	155.3700
Pierce County	6060149	WQDN364	155.6100
Pierce County	6060149	WQDN364	156.0600
Pierce County	6060149	WQDN364	156.0900
Pierce County	6060149	WQDN364	158.9100
Pierce County	6060149	WQDN364	159.0300
Pierce County	6060149	WQDN364	453.6250
Pierce County	6060149	WQDN364	458.6250
Pierce County	6060149	WQEA684	156.0600
Pierce County	6060149	WQEA684	156.2400
Pierce County	6060149	WQES897	156.2400
Pierce County	6060149	WQEY450	153.8900
Pierce County	6060149	WQEY450	154.3550
Pierce County	6060149	WQFQ208	155.3700
Pierce County	6060149	WQFQ208	156.0900
Pierce County	6060149	WQFQ208	453.6250
Pierce County	6060149	WQFQ208	458.6250
Pierce County	6060149	WQMA347	453.7500
Pierce County	6060149	WQMA347	458.7500
Pierce County	6060169	WXY503	155.3700

<b>Entity</b>	<b>FRN</b>	<b>CALL SIGN</b>	<b>FREQUENCY</b>
BUCKLEY, CITY OF	1577352	KOI860	153.89
BUCKLEY, CITY OF	1577352	KOI860	154.265
BUCKLEY, CITY OF	1577352	KOI860	154.355
CENTRAL PIERCE FIRE PROTECTION DISTRICT 6	6270383	KOA972	153.89
CENTRAL PIERCE FIRE PROTECTION DISTRICT 6	6270383	KOA972	154.355
City of Tacoma	1562909	KOF221	153.89
City of Tacoma	1562909	KOF221	154.355
DUPONT, CITY OF	1575521	WRU859	153.89
DUPONT, CITY OF	1575521	WRU859	154.355
EATONVILLE, TOWN OF	1577196	KOK458	153.89
EATONVILLE, TOWN OF	1577196	KOK458	154.355
FIFE, CITY OF	5754445	KTS776	153.89
GRAHAM FIRE & RESCUE, COUNTY OF PIERCE	1581461	KDV657	153.89
GRAHAM FIRE & RESCUE, COUNTY OF PIERCE	1581461	KDV657	154.16
GRAHAM FIRE & RESCUE, COUNTY OF PIERCE	1581461	KDV657	154.265
GRAHAM FIRE & RESCUE, COUNTY OF PIERCE	1581461	KDV657	154.355
PIERCE COUNTY FIRE DIST 14	14027346	WPIY683	153.89
PIERCE COUNTY FIRE DIST 14	14027346	WPIY683	154.16
PIERCE COUNTY FIRE DIST 14	14027346	WPIY683	154.265
PIERCE COUNTY FIRE DIST 14	14027346	WPIY683	154.355
PIERCE COUNTY FIRE DISTRICT #25	13074968	KNIR647	153.89
PIERCE COUNTY FIRE DISTRICT #25	13074968	KNIR647	154.355
PIERCE COUNTY FIRE DISTRICT 13	10493435	KNJE205	153.89
PIERCE COUNTY FIRE DISTRICT 13	10493435	KNJE205	154.355
PIERCE COUNTY FIRE DISTRICT 18	1577741	KNIR648	153.89
PIERCE COUNTY FIRE DISTRICT 18	1577741	KNIR648	154.355
PIERCE COUNTY FIRE DISTRICT 20	1572148	WQP829	153.89
PIERCE COUNTY FIRE DISTRICT 20	1572148	WQP829	154.265
PIERCE COUNTY FIRE DISTRICT 20	1572148	WQP829	154.355
PIERCE COUNTY FIRE DISTRICT 23	1571751	KIC226	153.89
PIERCE COUNTY FIRE DISTRICT 23	1571751	KIC226	154.355
PIERCE COUNTY FIRE DISTRICT 26	1570381	WPUK474	153.89
PIERCE COUNTY FIRE DISTRICT 26	1570381	WPUK474	154.355
PIERCE COUNTY FIRE DISTRICT 5	9985201	KOM829	153.89
PIERCE COUNTY FIRE DISTRICT 5	9985201	KOM829	154.355
PIERCE COUNTY FIRE DISTRICT 8	1581560	KOL355	153.89
PIERCE COUNTY FIRE DISTRICT 8	1581560	KOL355	154.355
PIERCE COUNTY FIRE PROT DIST 12	4524708	WNBZ820	153.89
PIERCE COUNTY FIRE PROT DIST 12	4524708	WNBZ820	154.265
PIERCE COUNTY FIRE PROT DIST 12	4524708	WNBZ820	154.355
PUYALLUP CITY OF	11315082	KOI954	153.89
PUYALLUP CITY OF	11315082	KOI954	154.16
PUYALLUP CITY OF	11315082	KOI954	154.265
PUYALLUP CITY OF	11315082	KOI954	154.355
West Pierce Fire & Rescue	1581578	KOB276	153.89

<b>Entity</b>	<b>FRN</b>	<b>CALL SIGN</b>	<b>FREQUENCY</b>
West Pierce Fire & Rescue	1581578	KOB276	154.16
West Pierce Fire & Rescue	1581578	KOB276	154.265
West Pierce Fire & Rescue	1581578	KOB276	154.355
West Pierce Fire & Rescue	1581578	KOK496	153.89
West Pierce Fire & Rescue	1581578	KOK496	154.355
West Pierce Fire & Rescue	1581578	WPZY792	153.89
West Pierce Fire & Rescue	1581578	WPZY792	154.16
West Pierce Fire & Rescue	1581578	WQEX786	153.89
West Pierce Fire & Rescue	1581578	WQEX786	154.355