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# MILLER & VAN EATON
P. L. L. C.

MATTHEW C. AMES
KENNETH A. BRUNETTI†
FREDERICK E. ELLROD III
MARCEL L. FRISCHKORN
MITSUKO R. HERRERA†
WILLIAM L. LOWERY

†Admitted to Practice in California Only

Incorporating the Practice of Miller & Holbrooke

1155 CONNECTICUT AVENUE, N.W.
SUITE 1000
WASHINGTON, D.C. 20036-4320
TELEPHONE (202) 785-0600
FAX (202) 785-1234

MILLER & VAN EATON, L.L.P.
400 MONTGOMERY STREET
SUITE 501
SAN FRANCISCO, CALIFORNIA 94104-1215
TELEPHONE (415) 477-3650
FAX (415) 477-3652

WWW.MILLERVANEATON.COM

WILLIAM R. MALONE
NICHOLAS P. MILLER
HOLLY L. SAURER
JOSEPH VAN EATON

OF COUNSEL:
JAMES R. HOBSON
GERARD L. LEDERER**
JOHN F. NOBLE

**Admitted to Practice in New Jersey Only

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June 27, 2002

Marlene H. Dortch
Secretary
Federal Communications Commission
Washington, D.C. 20554

Re: Anne Arundel County Reply to Comments, WT Docket 02-100

Dear Ms. Dortch:

On June 25, 2002, Anne Arundel County filed, in the referenced matter, reply comments containing an attached Declaration by Jeffrey P. Martin. The attachment submitted at that time was a facsimile version of the Declaration. For your records, I am supplying the original, with Mr. Martin's original signature.

Please stamp as received, and return in the enclosed postage-paid envelope, the enclosed copy of the original.

Sincerely,

James R. Hobson

cc: Lori Blair, County Office of Law

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DECLARATION

Pursuant to Section 1.16 of the Rules of the Federal Communications Commission, I declare under penalty of perjury that the following is true and correct:

1. I am a Senior RF Engineering Consultant with RCC, an engineering consulting firm assisting Anne Arundel County in identifying sources of interference to its present 800 MHz public safety radio system. In December 2001, as testified by County Police Chief Thomas Shanahan and recapitulated in the County's Comments of June 10, 2002 in this proceeding (page 2 and Exhibit B), RCC's testing had identified 41 "dead zones" or "dead spots" in the County where public safety communications were either blocked or seriously degraded. Since then, an additional 20 such areas have been found, for a total of 61.

2. In seeking to identify or narrow possible CMRS sources of interference that might explain the dead zones, the County in June of 2001 asked several wireless service providers for the following information:

-Location of Cellular Sites to test interference in close proximity

-Frequencies assigned for use in inter-modulation studies

-RF System configurations to identify high-intensity signals

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By July of 2001, the information had been received from Nextel and Verizon. Cingular initially objected to providing the data, but eventually did so in November of 2001 after the completion of the initial county-wide testing.

3. The County's telecommunications staff and RCC are, of course, aware that CMRS transmitters undergo minor changes in frequency, power level and orientation in the ordinary course of cellular system operation. As a matter of fact, many carriers are migrating to

dynamic channel allocation algorithms to improve their channel efficiency. The intent of the ordinance was not to re-certify these essentially automatic adjustments of daily operation but to capture those deliberate decisions by a wireless carrier to change power, frequency and antenna orientation so as to modify significantly the operation of its system in the County.

Jeffrey P. Martin

June 25, 2002

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