



# Marion County Emergency Telephone System Board

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**Chairman Leon Duis \* Vice Chairman Lonnie McDaneld \* Secretary Bob Arny \* Exec Board Member Greg Earle**

September 25, 2003

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: WT Docket No. 99-87/RM-9332

Dear Ms. Dortch:

On behalf of Marion County 9-1-1, I would like to express our support for the petition for reconsideration filed by the Association of Public-Safety Communications Officials (APCO), the International Association of Fire Chiefs and other public safety organizations in the above-referenced proceeding regarding mandatory migration to narrowband operations on land mobile radio systems in the VHF High Band (150-170 MHz) and UHF (421-512 MHz) frequencies.

The current deadline of January 13, 2004, for the FCC to accept applications to modify existing 25 kHz systems will prevent public safety licensees from adding critical capacity and coverage for existing systems. Such modifications should be permitted until January 1, 2013, to coincide with a final complete migration deadline. In the State of Illinois there is a critical need to increase capacity and enhance the coverage of our wide band mutual aid and fire ground operational channels throughout the State.

The current rule prohibits any new system applied for after January 13, 2004, from operating with 25 kHz equipment. There needs to be an exception to that rule to accommodate new systems that must maintain interoperability with existing 25 kHz-only systems. There is a significant portion of the State that is working to improve our interoperability for mutual aid operations. The current rules will significantly hinder our efforts to provide interoperability for a major portion of the State.

The current rule will make it impossible for many state and local governments to add capacity or replace broken and worn-out radios after 2008, when 25 kHz capable radio will no longer be allowed to be manufactured or imported. That date should be extended to January 1, 2013, to coincide with a final complete migration deadline.

TDMA and other multi-bandwidth mode equipment can provide important efficiencies for certain types of public safety radio systems. Mobile data systems also provide critical functionality to modern public safety communications operations, but generally require wideband (25 kHz) channels and are consistent with maximum spectral efficiency. The FCC should continue to allow such operations, so long as efficiency guidelines are met.

Respectfully submitted,

*Tom Ling*

Tom Ling  
9-1-1 Coordinator

**Tom Ling - ENP- 9-1-1 Coordinator**  
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