

April 22, 2004

D'Wana R. Terry
Chief, Public Safety and Critical Infrastructure Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12 ST SW
Washington, D.C. 20554

Reference WT Docket No. 02-378

Dear Chief Terry,

I respectfully submit this letter in support of Petition for Reconsideration of the Region 24, 700 MHz Regional Planning Committee, WT Docket No. 02-378. The City of Independence, Missouri is currently in the process of implementation of a 700 MHz, Interoperable Voice and Data Communication System. This project for a 700 MHz system is funded through a FEMA grant in conjunction with the Department of Homeland Security covering grant programs for Interoperable Communications Equipment (ICE). The City of Independence was awarded this grant by FEMA on September 25, 2003, nine days after Missouri originally submitted its proposed 700MHz Regional Plan. Therefore, the Region Chairman, Stephen T. Devine of the Missouri State Highway Patrol Communications Division, was unable to include this fact for Commission review in the initial filing of the plan.

Time constraints for implementation of this ICE grant have been imposed on the City of Independence by FEMA of one year from the award date to implement the system and expend the FEMA funds. Grant administrators with FEMA have been contacted and the City of Independence has asked for an extension on the grant period, in part, due to waiting on FCC approval of the Region 24 700 MHz plan. At this time, FEMA grant administrators have informed the City of Independence to re-file for an extension in early summer. FEMA has made it clear not to expect more than a 12-month extension from the original time allotted. These time periods make it critical for the City of Independence to obtain designated 700MHz frequencies from the established Region 24 channel allotments included in the plan before you as quickly as possible.

In addition to impacting the City of Independence, the delay in approval of the Region 24 700MHz plan will have an adverse affect on public safety agencies adjoining Independence in the Kansas City metropolitan region. The City of Independence has worked with the Kansas City Missouri Police Department, the recipient of an ICE grant through the Office of Community Oriented Policing (COPS), and the Mid-America Regional Council (MARC), who has been

awarded funding through the Urban Areas Security Initiative (UASI) for interoperable communications. Both of these agencies have partnered with the City of Independence in coordinating enhanced regional interoperability within the 116 public safety agencies in the Kansas City metropolitan area. This regional process is through the implementation of an area wide 700MHz interoperable voice system as well as a separate 700MHz data system. The City of Independence grant has provided a foundation to speed the implementation of 700MHz, and regional interoperability, throughout this area.

Therefore, the City of Independence respectfully supports the Region 24 petition for reconsideration to allow us to move forward as quickly as possible in the implementation of these projects and meet mandatory grant specified deadlines. With the 700 MHz band being clear of broadcaster incumbency in the area, we believe the community deserves the opportunity to utilize this important block of public safety spectrum.

I appreciate your consideration in this matter. Please feel free to contact me if I can provide any additional information.

Respectfully,

Fred M. Mills
Chief of Police

cc; Senator Christopher Bond
Senator James Talent
Representative Karen McCarthy
Representative Sam Graves
Governor Bob Holden