



October 19, 2007

Via FCC ECFS

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

Attn: Mr. Derek Poarch, Chief, Public Safety and Homeland Security Bureau

Re: PS Docket No. 06-229, WT Docket No. 96-86, DA 07-4168
Licensee: Pierce Transit
Callsign: WQHJ937
Service:SY
Purpose: Certification of Existing Base Station and Subscriber Radio Equipment Deployed in TV Channels 63 and 68, and the Upper 1 MHz of Channels 64 and 69 as of August 30, 2007

Dear Ms. Dortch:

Pursuant to the October, 5, 2007, Public Notice (DA 07-4168), Pierce Transit hereby certifies the following information regarding its 700 MHz narrowband radio system.

1. As of August 30, 2007, Pierce Transit had three (3) portable handsets operating in the described channels of the Second Report & Order.
2. Pierce Transit's system operates within a 50 Kilometer radius of 47-16-22.0 N, 122-26-27.0 W.
3. As of August 30, 2007, Pierce Transit had 24 base stations serving the handsets listed in item 1, above.
4. The base stations listed in item 3, above, are located at:

<i>Location</i>	<i>Latitude (NAD83)</i>	<i>Longitude (NAD83)</i>
Graham Hill	47-01-44.9 N	122-18-02.0 W
Puyallup EOC	47-09-05.4 N	122-16-46.2 W
Indian Hill	47-18-13.8 N	122-23-47.8 W

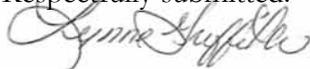
5. Contact information for all handsets and base stations is:

Ron Moyer, IT Project Manager
Pierce Transit
PO Box 99070
3701 96th St., SW
Lakewood, WA 98496-0070
(253) 581-8022
rmoyer@piercetransit.org

Pierce Transit has submitted both a waiver request (August 30, 2007) and a petition for reconsideration (September 24, 2007) due to the ongoing implementation of our system, seeking, among other things, authority to continue deployment of its system and reimbursement for equipment that is placed in operation after the August 30 deadline. The equipment totals and information above reflect only such equipment as was in operation as of August 30, 2007. Attachment A, hereto, includes totals and an implementation schedule for our remaining mobile and portable handsets and base stations, which are in the process of being deployed, but were not in operation as of August 30. Attachment A also includes the information applicable to such equipment required by the October 5 Public Notice. As reflected in its waiver request and petition for reconsideration, Pierce Transit seeks reimbursement costs for its equipment being deployed but not yet in operation to the same extent as its equipment in operation as of August 30. Accordingly it is providing herewith the information required by the October 5 Public Notice for equipment being deployed but not yet operational out of an abundance of caution, and to preserve its right to obtain reimbursement for such equipment.

The information provided in this certification is true, complete, correct, and made in good faith.

Respectfully submitted:



Lynne Griffith
Chief Executive Officer

Attachments

cc: Jeff Cohen, Senior Legal Counsel, PSHSB
Jon Wiswell, Region 43 – 700 MHz Planning Committee Chair
Martin L. Stern, Esq., K&L Gates (Counsel to Pierce Transit)
John Eagler, Macro Corporation
Lenny Gemar, Motorola



Attachment A –Pierce Transit Deployment Plan & Base Station Locations

Month	Activities	Number of Base Stations	Number of Subscriber Radios (mobile, portable and Consolettes)
Dec-06	Factory Test of System	48	657
Aug-07	Install and Test 3 sites	24	3
Sep-07	Install and Test 1 site	8	1
Oct-07	Install and Test 2 sites	16	3
Oct-07	Install and Test Backup control stations	0	5
Nov-07	Install Test Vehicles	0	10
Feb-08	Install Minifleet Vehicles	0	10
Mar-08	Fleet Installation & Portable Deployment	0	165
Apr-08	Fleet Installation & Portable Deployment	0	180
May-08	Fleet Installation & Portable Deployment	0	180
Jun-08	Fleet Installation & Portable Deployment	0	100
	Total	48	657

Aug-30-2007

Location	Latitude (NAD83)	Longitude (NAD83)
Graham Hill	47-01-44.9 N	122-18-2.0 W
Puyallup EOC	47-09-05.4 N	122-16-46.2 W
Indian Hill	47-18-13.8 N	122-23-47.8 W
Top Hat	47-30-12.0 N	122-20-14.0 W
Purdy Transfer Station	47-23-27.0 N	122-36-29.0 W
Hemlock Hill	47-09-52.0 N	122-33-27.0 W

Mobile Area of Operations:
50 km radius around 47-16-22.0 N / 122-26-27.0 W