

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Improving Public Safety Communications In the 800 MHz Band)	
)	
Request for Extension of Time)	WC Docket No. 02-55
By County of Clay, Florida)	

REQUEST FOR EXTENSION OF TIME

County of Clay, a Florida body corporate and politic (“Clay County”), by its attorneys, hereby requests a modest extension of time to submit its cost estimate to Sprint Nextel (“Sprint”) beyond the date specified in the Federal Communications Commission’s Public Notice FCC 07-168, released September 12, 2007, “FCC Announces Supplemental Procedures and Provides Guidance for Completion of 800 MHz Rebanding” (“September 12 Notice”). This Public Notice required that the National Public Safety Planning Advisory Committee (“NPSPAC”) licensees in Wave 3 complete planning and submit a cost estimate to Sprint by December 15, 2007. Clay County requests it be granted an extension until January 11, 2008 to submit this cost estimate.

Clay County operates its 800 MHz Public Safety system pursuant to FCC license WPDC613, consisting of a primary trunked system and two (2) mutual aid repeaters. The primary system infrastructure is a 6 site simulcast Multi-Net[®] system with 1 additional receive-only site, originally supplied by EFJohnson. Site capacity is 11 channels per site, with a total of 66 active channels. In addition, there are two (2) Mutual Aid repeaters at the Keystone

site, with voted receivers located at the Sleepy Hollow site, operating on National I-TAC / I-Call channels. The sites are connected via a simulcast control point to an RNT3000 switch, which provides the interface between the sites and the dispatch center.

Clay County, its consultants, and its equipment vendor EFJohnson negotiated diligently, professionally and in good faith to complete a Rebanding Agreement (between EFJ and Clay County) and associated Statement of Work ("SOW") in a timely manner. Even as late as mid-November, the parties reasonably believed negotiations on the SOW and Rebanding Agreement would be completed in a timely manner. Notwithstanding the diligent and cooperative efforts of Clay County and EFJ, internal review procedures within the County and concerns regarding the disclosure of the EFJ cost data prior to execution of the Rebanding Agreement caused an unforeseen delay in finalizing Clay County's cost estimate for delivery to Sprint.

Fortunately, these internal issues have been addressed, but not in sufficient time to meet the December 15, 2007, due date for submitting the cost estimate to Sprint. Recognizing that this benchmark could not be met and the Commission's interest in concluding rebanding projects as timely as possible, Clay County and EFJ revisited the rebanding project timeline and agreed that thirteen (13) weeks could be shaved from the rebanding project. While the project will not commence until after the Rebanding Agreement with EFJ is executed and the Frequency Rebanding Agreement is agreed to by Clay County and Sprint and approved by the Transition Administrator, Clay County reasonably believes that the substantial, recently agreed to reduction in the overall project timeline merits the relief from the intermediate December 15, 2007 benchmark.

In light of the foregoing and the fast approaching holidays, Clay County respectfully requests the Commission waive the December 15, 2007 due date and grant Clay County an

extension until January 11, 2008, to provide its cost estimate to Sprint. Inasmuch as Clay County has succeeded in reducing by thirteen (13) weeks the overall project timeline, it is respectfully submitted that the grant of this request will further the Commission's objectives of concluding rebanding projects in a timely manner, facilitate timely final internal approval by Clay County of the agreements essential to its 800 MHz rebanding project, and otherwise further the public interest.

Respectfully submitted,
County of Clay, Florida

By: /s/ C. Douglas Jarrett
C. Douglas Jarrett
Greg Kunkle
Keller and Heckman LLP
1001 G Street, Suite 500 West
Washington, D.C. 20001
(202) 434-4100
Its Attorneys

Date: December 14, 2007

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of December, 2007, the foregoing Request for Extension of Time of County of Clay, Florida was submitted electronically to the Federal Communications Commission and served via electronic mail upon the following:

Richard S. Dodd, Counsel
Sprint Nextel Corporation
2001 Edmund Halley Drive, Reston, VA 20191
richard.dodd@sprint.com

Andy Eakin
Manager, Radio Unit
Clay County Sheriff's Office
Green Cove Springs, FL 32043
aeakin@claysheriff.com

Jack L. Wuerker
Squire, Sanders & Dempsey L.L.P.
8000 Towers Crescent Drive
Fourteenth Floor
Tysons Corner, Virginia 22182-2700
jwuerker@ssd.com
TA Mediator

Alireza Shahnami, Vice President
ACD Telecom, Inc.
1268 Upsala Rd
Sanford, Fl 32771
ali.shahnami@acdtelecom.com
Consultant to Clay County, Fl

/s/

Greg Kunkle