

Before the  
Federal Communications Commission  
Washington, DC 20554

REC-24  
MAR 24 2008

In the Matter of	)	WT Docket No. 02-55
	)	
Improving Public Safety	)	Licensee Name <u>Arlington, County of</u>
Communications in the	)	Call Sign <u>WQFY835 - KNIR 504</u>
800 MHz Band	)	

To: Public Safety and Homeland Security Bureau, Federal Communications Commission

**REQUEST FOR WAIVER  
OF THE  
JUNE 26, 2008 DEADLINE FOR COMPLETION OF 800 MHZ REBANDING**

Pursuant to Section 1.925 (47 C.F.R. § 1.925) of the rules of the Federal Communications Commission (Commission) and the Commission's *Public Notice*,<sup>1</sup> the above-referenced licensee ("Licensee") requests a waiver of the Commission's requirement for the Licensee to complete its 800 MHz rebanding by June 26, 2008.<sup>2</sup> The Licensee recognizes that the Commission has noted: "Requests for extension will be subject to a high level of scrutiny. Licensees will be expected to demonstrate that they have worked diligently and in good faith to complete rebanding expeditiously, and that the amount of additional time requested is no more than is reasonably necessary to complete the rebanding process."<sup>3</sup>

Specifically, the Licensee requests until THE NCR IS READY to complete its 800 MHz rebanding. The public interest would be served by granting the requested waiver because it would allow Licensee to reband its 800 MHz system in a reasonable, prudent and timely manner consistent with the goals of the 800 MHz rebanding program. In support of this Request for Waiver the Licensee provides the attached Waiver Request Information Form and the following explanation of the reason(s) for not completing

<sup>1</sup> Federal Communications Commission Provides Guidance for Submission of Requests for Waiver of June 26, 2008 Deadline for Completion of 800 MHz Rebanding, *Public Notice*, FCC 08-23 (rel. Jan. 17, 2008).

<sup>2</sup> See Improving Public Safety Communications in the 800 MHz Band, *Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order*, 19 FCC Rcd 14969 (2004), *Third Memorandum Opinion and Order*, 22 FCC Rcd 17209, 17224 ¶ 48 (2007).

<sup>3</sup> See FCC Announces Supplemental Procedures And Provides Guidance For Completion Of 800 MHz Rebanding, *Public Notice*, 22 FCC Rcd 17227, 17232 (2007).

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List ABCDE

Request for Waiver of the June 26, 2008 Deadline for Completion of 800 MHz Rebanding

Licensee Name ARLINGTON, COUNTY OF

Call Sign WQFY835 - KNIA 704

DL 8910427576

reconfiguration by June 26, 2008, which is consistent with the assertion that a grant of the waiver would serve the public interest.

Check if additional sheets are attached.

Finally, the licensee seeks confidential treatment of the Waiver Request Information Form pursuant to Section 0.459 of the FCC's Rules because the information contained therein is highly sensitive regarding the operations of a public safety organization's communications system. Furthermore, the information contained in the form is not otherwise publicly available. The Licensee consents to the disclosure of the form to the 800 MHz Transition Administrator ("TA") and Sprint Nextel and requests that they treat the form as confidential.

Respectfully Submitted,

Lisa K Thompson 3/14/08  
Signature Date

LISA K. THOMPSON  
Name and Title  
RADIO System Mgr.

## Waiver Request Information Form

Confidential treatment sought pursuant to Section 0.459 of the FCC's Rules.

### 1 Licensee Information

1A	Licensee/Entity Name	ARLINGTON, County of
1B	Lead Call Sign	WQFY 835 → KNIQ 704
1C	Sprint Nextel Deal ID (if known)	DL 8910427576

Please designate an 800 MHz call sign that is subject to rebanding to be used for tracking purposes. If possible the selected call sign should include at least one fixed based station. The Licensee Name and Call Sign provided on this form should match the same information in the caption of the Request for Waiver to which this form is attached.

1D	Licensee Contact Person Name	LISA K. THOMPSON
1E	Licensee Contact Title	Radio System Mgr.
1F	Contact Address 1	1400 N. Uhle St
1G	Contact Address 2	5th FLR ECC
1H	City	Arlington
1I	State	VA
1J	Zip	22201
1K	Business Phone Number	703.228.4009
1L	Business Fax Number	703.228.3989
1M	Email Address	lthompson@arlingtonva.us

### 2 Size and Complexity of System

2A	Equipment Manufacturer(s)	MOTOROLA			
2B	Type of Radio System ( check all that may apply )	<input checked="" type="checkbox"/> Conventional <i>some</i>	<input checked="" type="checkbox"/> Trunked	<input checked="" type="checkbox"/> Simulcast	<input type="checkbox"/> Other (e.g., data only) _____
2C	Number of Fixed Repeater Sites				
2D	Number of Subscriber Units		Portables	Mobiles	<del>Data</del>
		To be Replaced			
		To be Reflashed	1000	800	
		To be Retuned			
	Not Yet Known	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Waiver Request Information Form  
 Licensee Name Arlington County of  
 Call Sign WQFY838 - KN1Q704  
 DL 9910427576

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**3 Interoperability**

3A Do you interoperate with other 800 MHz systems?  Yes  No  
 If yes (3A), please list these agencies and describe how such interoperability will affect your rebanding schedule. Specifically note if there are agencies that must reband before you will be able to reband.

	Agency Name	Agency Lead Call Sign	Affect on Your Schedule	Must Reband Before
3B	SEE	NCR	DOCUMENTATION	<input type="checkbox"/>
3C				<input type="checkbox"/>

( additional table space at the end of this form, page 8 )

**4 Steps Already Taken to Complete Physical Reconfiguration**

Frequency Reconfiguration Agreement (FRA)

Do you have an FRA executed with Sprint Nextel that covers both infrastructure and subscriber units (mobiles and portables)?

4A  Yes  No

4B If no (4A), when do you anticipate having such an FRA executed? ( M / D / Y ) \_\_\_ / \_\_\_ / \_\_\_

If you do not have an executed FRA covering both infrastructure and subscriber units please provide as much information to the following questions as possible.

Subscriber Equipment Deployment (SED) Program

Did you execute an FRA with Sprint for early reconfiguration of subscriber units?

4C  Yes  No

Implementation Planning Session (IPS)

4D NPSPAC Public Safety Region number: 20 [ See: <http://www.800ta.org/content/faqs/rpp.asp> ]

4E Have you attended an IPS?  Yes  No

4F If no (4E), have you RSVPed to attend an IPS?  Yes  No

The TA has not scheduled an IPS in every NPSPAC Public Safety Region. IPSs are scheduled as needed based on the interoperability of the licensees in each region. For a schedule of IPSs held to date please see [www.800ta.org](http://www.800ta.org).

Waiver Request Information Form  
Licensee Name Arlington, County of  
Call Sign WQFY 835 → KNIA 764  
DL 8910427576

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Vendor Information

4G Are you reconfiguring using solely internal labor?  Yes  No

If no (4G), provide the following:

4H Name of Primary Vendor Performing Reconfiguration Services: Wireless Communications

4I Do you have a signed contract with this vendor?  Yes  No

4J Have you had your vendor kick-off meeting?  Yes  No

4K If no (4J), when is the kick-off meeting scheduled? (M/D/Y)     /    /    

Channel Clearing Request(s) -- CCR(s)

4L Has Sprint Nextel notified you that they have cleared your new frequencies?  Yes  No

4M If no (4L), have you entered into an agreement with Sprint Nextel that contains a firm date(s) for Sprint Nextel to clear your new frequencies?  Yes  No

4N If no (4M), have you requested that Sprint Nextel clear your new frequencies?  Yes  No

5 Other

Describe any other steps that you have taken to date to complete physical reconfiguration.

5A Reprogrammed all my subscribers in Oct 07  
using known data of ~~repe~~ rebanded frequencies.

Have done everything possible. Am now waiting  
for the NCR to reband.

\* It has just come to my attention that Arlington Co. was  
assigned AND licensed for the (a) wrong channel.  
We should have been licensed for 868.1875 (CH 766) but  
was erroneously assigned 867.1875 (CH 690)  
When rebanded → this CH will need to be rebanded  
down 14 MHz - not 15 to rectify the situation.

Waiver Request Information Form

Licensee Name ARLINGTON, COUNTY OF

Call Sign WQFY 835 -> KNIR 704

DL 8910427576

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**Proposed Timetables**

If you attended a TA-sponsored IPS the schedule and interoperability information requested below was discussed at the IPS and you would have received from the TA a written confirmation of your proposed schedule. You may use that information to complete sections below; if such information has changed, please provide updates as appropriate:

**6 Proposed Timetable Subscriber Units**

6A Does the reconfiguration of your subscriber units involve multiple touches to your subscriber units? For example, one touch to put the new channels into the subscriber units and a subsequent touch to remove the old channels from the subscriber units.  Yes  No

If a single touch, with respect to your subscriber units:

6B Estimated/Actual start date: U/N/K Estimated/Actual completion date: U/N/K

If you have a second touch please provide:

6C Estimated/Actual start date: U/N/K Estimated/Actual completion date: U/N/K

If you have more than two touches, including any "clean-up," please describe and provide a start date and completion date below:

6D NCR DATES

6E Start date (6D): \_\_\_/\_\_\_/\_\_\_ Completion date (6D): \_\_\_/\_\_\_/\_\_\_

**7 Proposed Timetable Infrastructure Schedule**

With respect to infrastructure please provide:

7A Estimated/Actual start date: N/C/R Estimated/Actual completion date: N/C/R

**8 Anticipated Completion**

8A When do you anticipate operating on your new frequencies? (M/D/Y) when NCR REBANDS

8B If, different, when do you anticipate vacating your old frequencies? (M/D/Y) \_\_\_/\_\_\_/\_\_\_

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8C When do you anticipate completing the physical rebanding of your system including, removing old channels from subscriber units, testing and clean-up? (M/D/Y) N/C/R

Waiver Request Information Form

Licensee Name **ARLINGTON, COUNTY OF**

Call Sign **WQFY835 - KNIA704**

DL **8910427576**

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	Agency Name	Agency Lead Call Sign	Affect on Your Schedule	Must Reband Before
3D	Please see NCR documentation provided by Fairfax County, Va (lead agency)			<input type="checkbox"/>
3E				<input type="checkbox"/>
3F				<input type="checkbox"/>
3G				<input type="checkbox"/>
3H				<input type="checkbox"/>
3I				<input type="checkbox"/>
3J				<input type="checkbox"/>
3K				<input type="checkbox"/>
3L				<input type="checkbox"/>
3M				<input type="checkbox"/>
3N				<input type="checkbox"/>
3P				<input type="checkbox"/>
3R				<input type="checkbox"/>
3S				<input type="checkbox"/>
3T				<input type="checkbox"/>

Waiver Request Information Form

Licensee Name ARLINGTON, COUNTY OF

Call Sign WAFF 835 - KNIA 704

DL 891042-576

Confidential treatment sought pursuant to Section 0.459 of the FCC's Rules.

\*\* END OF FORM TA-13.0 \*\*