

Table of Contents

I. Introduction.....	3
II. Background.....	4
III. Requests for Narrowbanding Waiver.....	6
IV. Conclusion	8
V. Appendix A – Public safety Agencies in St. Charles County	11
VI. Appendix B – 43 Radio Authorizations.....	12
VII. Appendix C – Existing 800 MHz Licenses.....	14
VIII. Appendix D – 800 MHz Extended Implementation Schedule.....	15

I. INTRODUCTION

As the sponsoring agency responsible to operate a new countywide 800 MHz trunked interoperable radio system serving county and local public safety agencies, the County of St. Charles, Missouri, (“The County”) appointed to represent all public safety agencies within St. Charles County (that includes 9 municipalities, 12 law enforcement agencies, 12 fire departments and districts with 2,983 radios operating within the geographic borders of St. Charles County) which will migrate to the new county-wide emergency communication system (listed in Appendix A) hereby respectfully requests that the Federal Communications Commission (“Commission” or “FCC”) grant a waiver of 47 C.F.R. § 90.209(b), specifically the requirement to convert 43FCC radio authorizations (listed in Appendix B) operating within the County of St. Charles, MO to a bandwidth of 11.25 kHz or less by the date of January 1, 2013.¹ The new county-wide radio system will be operated and managed by the County. The County Council appointed the county policy group that includes representation from County and Municipal Police Departments, Municipal Fire Departments and Fire Districts, and county and municipal leadership. We believe that the current narrowbanding deadline of December 31, 2012 poses a significant threat to the St. Louis Urban Area² (“Urban Area”) and the County plan to complete implementation of an essential interoperable communication county-wide system for all first responders in the St. Louis Urban Area. The Urban Area encompasses over 250 public safety agencies with over 23,000 public safety radio users.

¹ See *Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, Third Memorandum Opinion and Order, Third Further Notice of Proposed Rule Making and Order, WT Docket No. 99-87, 19 FCC Rcd 25045, 25051-52 ¶¶ 12-13 (2004) (requiring most PLMR licensees in the 150-174 MHz and 421-512 MHz bands to migrate to 12.5 kHz technology by January 1, 2013) (Narrowbanding Memorandum Opinion and Order); see also 47 C.F.R. § 90.209(b)(5).*

² *The Urban Area is defined as the Missouri counties of Franklin, Jefferson, St. Charles, St. Louis, the independent City of St. Louis, and the Illinois counties of Madison, Monroe and St. Clair.*

II. BACKGROUND

In 2003 the federal government began the Urban Areas Security Initiative (UASI) program to help urban areas deemed at risk to enhance their security in the face of terrorism and natural disasters. With funding from the UASI program, the St. Louis Area Regional Response System (STARRS) developed a Regional Emergency Communications Plan for improving interoperability in the St. Louis Urban Area. With the exception of the City of St. Louis, each of the counties in the UA has within its borders different forms of local government - which range from local municipalities with their own services (police, fire, public works, etc.) to single purpose political subdivisions that include fire protection, ambulance, school and sewer districts.

The County is a sponsoring agency in cooperation with the East-West Gateway Council of Governments to implement an eight county (and the independent City of St. Louis, MO) interoperable St. Louis Regional Land Mobile Emergency Communications Plan that was funded by Homeland Security Grants and was unanimously adopted by the region in June, 2008. The adopted plan was based on Homeland Security guidelines, that each of the eight counties in the Urban Area would fund, implement and operate independent county-wide systems networked together to create a system of systems.

This is part of the Urban Area Security Initiative to combat the threats to the safety of the public that may be caused by natural or man-made situations. Currently, the public safety agencies within the Urban Area are in the process of upgrading, procuring and implementing mission-critical communication systems on the current NPSPAC, Mid-Band, and 700 MHz narrowband radio frequency spectrum as allocated in the FCC NPSPAC Region 13 and 24

Planning Committees' 700 and 800MHz frequency plans. The Region 24 NPSPAC plan³ includes significant channel-frequency allocations to the County for the future expansion of its portion of the Emergency Communications Plan. The FCC has accepted the extended implementation plans (see Appendix C) for the current 800 MHz licenses⁴ and the Regional Planning Committees will be presented with the same extended implementation schedule for licensing of NPSPAC channels. Beginning November 2007, the St. Louis Urban Area started the development of the plan for this new system of systems implementation. The independent City of St. Louis is in the final stages of upgrading and expanding its 800 MHz trunked system and expects to complete the migration-to the system in early 2011. During 2009 and 2010, St. Clair County, Illinois expanded the use of its 800MHz trunked radio system to add fire departments that serve St. Clair and its neighboring counties. In addition, the Illinois counties of Madison and Monroe are expanding their use of the state 800MHz system and are transitioning public safety agencies to that state system. In 2009, Jefferson County 911 Dispatch, St. Charles County and St. Louis County in Missouri passed sales tax initiatives to fund the build-out of independent county-wide systems to support all of the public safety agencies that operate within the respective counties. The acquisition process for these systems has started and these three new systems will support over 14,000 of the estimated 23,000 public safety radio users of the

³ *Approved by the Federal Communications Commission September 2009*

⁴ *The Commission has approved an Extended Implementation Schedules for the St. Louis County trunked radio system until December 31, 2013 under radio authorization call signs WQLN802, WQLP208 subject to filing yearly progress reports. Radio authorization call sign WQJY940 has a pending amendment for extended implementation. Call Signs WQLN802, WQLP208 and WQJY940 are authorized to the Saint Louis County Radio Commission, FRN No. 0001825416*

Urban Area's combined public safety agencies. This expansion of the Urban Area's Land Mobile Emergency Communications Plan represents over \$150 Million in funds that have been committed to provide emergency radio communications to over 50% of the Urban Area's public safety radio users. Franklin County, Missouri is in the final stage of developing its funding plan once implemented; this will complete the regions' transition to 800MHz interoperable radio communications platforms. Jefferson County 911 Dispatch, St. Charles County and St. Louis County are currently scheduled to be evaluating bid proposals during the 3rd and 4nd quarter of 2010 and fully expect their new systems to be completed on time and on budget by December 31st 2013.

III. REQUESTS FOR NARROWBANDING WAIVER.

Under Section 1.3 of the Commission's rules,⁵ the Commission may exercise its discretion to waive a rule for "good cause shown."⁶ A waiver is appropriate if special circumstances warrant a deviation from the general rule and such deviation will help serve the public interest.⁷

The waiver process allows the Commission to "maintain the fundamentals of principled regulation without sacrifice of administrative flexibility and feasibility."⁸ In deciding whether or not to grant specific waiver requests, the Commission has indicated it must "take into account considerations of hardship, equity, or more effective implementation of overall policy" in its

⁵ 47 C.F.R. § 1.3.

⁶ *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996; Petition of Southwestern Bell Telephone Company, Pacific Bell, and Nevada Bell for Expedited Declaratory Ruling on Interstate IntraLATA Toll Dialing Parity or, in the Alternative, Various Other Relief*, Order, 14 FCC Rcd 6806, ¶ 11 (1999).

⁷ *Id.* (citing *Northeast Cellular Telephone Co. v. FCC*, 897 F.2d 1164, 1166 (D.C. Cir. 1990) and *WAIT Radio v. FCC*, 418 F.2d 1153, 1159 (D.C. Cir. 1969)).

⁸ *WAIT Radio*, 418 F.2d at 1159.

broader quest for regulation in the “public interest.”⁹ As explained below, granting of the County’s request on behalf of the public safety licensees would serve policy objectives of the Commission, particularly the deployment of spectrum to meet public safety needs.

Narrowbanding the 215 channel-frequencies authorized by 43 radio authorizations, held by 15 unique FRN number licensees in the County, would divert extensive financial, and human resources to work on radio units and stations that will be dismantled within twelve months of the completion of the new county-wide system. Because of the St. Louis Regional Land Mobile Emergency Communications Plan Regional Plan’s breadth, complexity, and large number of participants, the County and the Urban Area cannot fully deploy this 800 MHz interoperable system by the January 1, 2013 deadline for narrowbanding. Requiring the County, the St. Louis Urban Area, and its partner public safety agencies to narrowband, then subsequently have the newly narrow-banded systems decommissioned within a few months appears counter to the public interest. Given the critical need for interoperable communications in the County and the Urban Area, the ability to fully utilize the Urban Area’s Land Mobile Emergency Communications Plan will improve interoperability, promote RF spectrum efficiencies, and reduce threats to the safety and lives of the County and Regions’ first responders and the health and property of the public they serve. Allowing the County and its member public safety licensees to continue operating on the VHF and UHF frequencies in the wideband mode will further the Commission’s goal of helping public safety provide the most effective and efficient communications for the American public.

⁹ *Id.*

IV. CONCLUSION

The County of St Louis, the St Louis Urban Area, and its member public safety agencies respectfully request that the Commission grant a waiver of the requirement to attain an efficiency standard of 12.5 kHz through the narrowbanding for the existing 43VHF and UHF radio authorizations identified in Appendix B. The duration of this waiver is to the end date of the Extended Implementation Schedule, December 31, 2013. That will permit an orderly transfer of the traffic load from those VHF and UHF stations to the new 800 MHz radio facilities. As the traffic is transferred, the radio authorizations for the underlying VHF, UHF channel-frequencies vacated will be cancelled through the appropriate FCC filings. Implementation project management of the new 800 MHz system will include tracking the prompt cancellation of vacated VHF and UHF channel-frequencies. The new interoperable 800 MHz radio system will have the capability of efficiently accommodating future expansion on the NPSPAC, Mid-Band, and 700 MHz channels.

The County and St. Louis Urban Area are aware of the high hurdle applied to a waiver of the Commission's rules and the requirement to clearly articulate the detailed considerations in Section 1.925 of the Commission's rules.¹⁰ We believe that this request complies with the submission details of the waiver process in that:

1. The underlying purpose of the narrowband rule would not be frustrated by waiver of this case. The waiver request does not extend the date for reduction of bandwidth to a lengthy or indefinite date, but asks to extend the requirement for a finite period of time to permit the establishment of a new interoperable region wide network. The basis for narrowband is to make additional spectrum available in the VHF and UHF band. This

¹⁰ 47 C.F.R. § 1.925.

goal will be accomplished when the county public safety agencies move to the new system and completely cancel all UHF and VHF licenses that are no longer required.

2. The grant of the waiver will be in the public interest. The cost of narrowbanding is an expense that competes with the need for an improved, interoperable communications network at a time when the economy shortage of tax dollars limits the expansion of funding sources.
3. Unique and unusual factual circumstances indicate the application of the rule would be unduly burdensome to the County and contrary to the Public Good. The County and UA had hoped that the new multi-agency interoperable system would be in operation prior to the January 1, 2013 narrowband transition date. As with many large, complex systems involving multi-jurisdictional agencies, the timing was delayed. To this is added the economic downturn, which has constrained state, county, and local governments from committing to large projects. The County has established the St. Charles County Policy Group that includes the governance framework for the new county system. Dedicated funding has now been obtained by the County for the implementation and operation of the new system. A new multi-agency, multi-county, interoperable system is a unique endeavor unto itself and will provide an example of what can be accomplished through cooperative efforts between county and local public safety agencies, and the Commission. We have moved in this direction with the encouragement and at the behest of the Department of Homeland Security who has recognized its value through direct and indirect grants.

Grant of the waiver as described above for each of the 43 VHF and UHF radio authorizations (listed in Appendix B) would therefore be in the public interest.

Respectfully Submitted,

By:  _____

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Respectfully Submitted,

By:  _____

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V. **APPENDIX A – PUBLIC SAFETY AGENCIES IN ST. CHARLES COUNTY**

Public Safety Agencies in St Charles County, Missouri	
Law Enforcement	Fire\EMS
Cottleville Police Department	Augusta Fire Protection District
Foristell Police Department	Central County Rescue & Fire Protection District
Lake Saint Louis Police Department	Cottleville Fire Protection District
New Melle Police Department	Lake Saint Louis Fire Protection District
O'Fallon Police Department	New Melle Fire Protection District
St. Charles City Police Department	O'Fallon Fire Department
St. Charles County Department of Corrections	Orchard Farm Fire Protection District
St. Charles County Sheriff's Office	Rivers Pointe Fire Protection District
St. Peters Police Department	St. Charles City Fire Department
Wentzville Police Department	St. Charles County Ambulance District/EMS
St. Charles Community College DPS	St. Charles County Fire Alarm
St. Charles County Juvenile Justice & Detention	Wentzville Fire Protection District

VI. APPENDIX B – 43 RADIO AUTHORIZATIONS

Callsign	License FRN	Licensee Name	Licensee City
WPUU990	0005019336	BI-STATE DEVELOPMENT AGENCY	ST LOUIS
WSL519	0002539336	CENTRAL COUNTY FIRE AND RESCUE	SAINT PETERS
WPKH797	0006067615	CITY OF NEW MELLE	NEW MELLE
WQG926	0002510725	CITY OF WENTZINVILLE	WENTZVILLE
KNJG666	0008921991	COTTLEVILLE, CITY OF	COTTLEVILLE
KYQ442	0004192977	LAKE SAINT LOUIS FIRE PROTECTION DIST	LAKE SAINT LOUIS
WNIA930	0002537512	LAKE SAINT LOUIS, CITY OF	LAKE SAINT LOUIS
KUI581	0002788149	O'FALLON, CITY OF	O'FALLON
KXZ610	0002510485	O'FALLON, CITY OF	O'FALLON
WPVI793	0002512093	SAINT CHARLES COUNTY OF	WENTZVILLE
WPIN963	0002512101	SAINT CHARLES PARKS & RECREATION BOARD	SAINT CHARLES
KAA217	0002512101	SAINT CHARLES, CITY OF	SAINT CHARLES
WPKR407	0002512101	SAINT CHARLES, CITY OF	SAINT CHARLES
KCR227	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
KEC748	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WPDF274	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WPDJ634	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WPDJ634	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WPDJ634	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WPDJ634	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WPDJ634	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WQAS437	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WQAS437	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WQCC612	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WQCC612	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WQCC612	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
WQCC612	0002512093	SAINT CHARLES, COUNTY OF	SAINT CHARLES
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
KKD426	0002540698	SAINT PETERS, CITY OF	SAINT PETERS
WNDE796	0002540698	SAINT PETERS, CITY OF	SAINT PETERS

KZO390	0002542439	ST CHARLES COUNTY AMBULANCE DISTRICT	SAINT PETERS
WNXQ438	0004192951	ST CHARLES COUNTY FIRE PROTECTION ASSOCIATION	WENTZVILLE
WPSD979	0004752606	ST CHARLES, COUNTY OF	SAINT CHARLES
KNFR268	0002512093	ST. CHARLES, COUNTY OF	SAINT CHARLES
KUQ880	0002510725	WENTZVILLE, CITY OF	WENTZVILLE
KUS658	0002510725	WENTZVILLE, CITY OF	WENTZVILLE

VII. APPENDIX C – EXISTING 800 MHZ LICENSES

Call Sign	Location	Channel	CP expiration	Notes
WQMB525	1	856.6625	12/31/2010	Extended implementation granted in initial filing.
New	1	854.5625	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	854.5875	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	854.6375	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	855.4125	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	856.5875	Pending	FCC File No. 0004284718. Extended implementation requested.
New	2	854.5625	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	854.5875	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	854.6375	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	855.4125	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	856.5875	Pending	FCC File No. 0004284718. Extended implementation requested.
New	3	854.5625	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	854.5875	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	854.6375	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	855.4125	Pending	FCC File No. 0004284718. Extended implementation requested.
"	"	856.5875	Pending	FCC File No. 0004284718. Extended implementation requested.

APPENDIX D
Request for Extended Implementation Schedule
Expedited Consideration Requested
Saint Charles County, MO

The County of Saint Charles, as part of the St. Louis Regional Communications Core Group a consortium of governmental agencies in the Greater St. Louis Region, consisting of the Counties of Franklin MO, St. Charles MO, Madison IL, Monroe IL, Jefferson County, MO, St. Clair IL, St. Louis MO, and the City of St. Louis MO and Jefferson County 911 Dispatch, MO, requests consideration of SLOW GROWTH IMPLEMENTATION as defined in 47CFR 90.629.

In June 2008, the above-referenced governmental agencies elected to move forward with an interoperability strategy with the adoption of the St. Louis Emergency Land Mobile Emergency Communications Plan. The Emergency Communications Plan is based on the following:

1. Networking independent digital county systems (i.e. system of systems) to support interoperable communications for first responders. This consists of interconnecting various county Project 25 trunked digital radio\microwave systems using the new regional microwave system collocated at the county trunked radio sites to improve system reliability and provide regional connectivity.
2. Creating a highly fault tolerant infrastructure thereby supporting all emergency public safety communications within the region.
3. Designing a system with the capacity and functionality to support additional non-emergency municipal users including local, county, regional, state and federal users.
4. Implementing an open standard (Project 25 and IP) based system of systems that is compatible with regional, as well as the State of Illinois and State of Missouri interoperability initiatives, including Region 13 and 24 Regional Planning Committees.
5. Coordinating with critical infrastructure service providers in the region to improve interoperability and share infrastructure where practical.

Objectives

The St. Louis Regional Communications Core Group decided to design a seamless regional interoperability emergency communications network that would efficiently utilize existing spectrum and the sharing communications assets. The required policies and procedures for all members of the St. Louis Regional Communications Core Group to support regional communications are currently under development. Three of the five Missouri localities within the St. Louis UASI without P25 systems, including Saint Charles

County, have secured funding for the development of specifications, procurement and implementation for new microwave and P25 radio systems. The remaining county is currently engaged in development of a funding strategy.

Governance

The St. Louis Regional Communications Core Group is a sub-committee to the Executive Board of the East West Gateway Council of Governments (EWG), which serves the greater St. Louis area. Members of the Core Group are appointed by members of the EWG Executive Board. Through the auspices of the EWG an Inter-local Agreement setting forth the governance and policies and procedures for regional interoperability is near completion and will serve as the governing document for the region's public safety communications. The Core Group coordinates with the respective county policy groups to improve interoperable communications across the region.

The County Policy Groups consists of representatives from fire, emergency communications, emergency management, emergency medical, police and public works representatives. The Core Group working with the County Policy Groups form working groups to develop communications protocols which once approved the Core Group and County Policy Groups become operating procedures for the region. There is also a technical sub-committee to the Operations Group consisting of technical personnel from the member localities that advise the Core Group on technical matters related to the systems and protocols.

Saint Charles County has formed a policy group that represents all emergency responders. These groups include county and municipal officials, representatives of municipal fire and police departments and fire and ambulance districts. The county policy groups coordinate county\regional activity with the Core Group. The county policy groups are responsible for coordinating with all emergency response agencies that operate within their respective counties, securing the required funding to implement and operate the county-wide emergency communications systems. County Policy groups have formed county based Operation Groups. The Operations Group is responsible for the development of communications protocols which once approved by the County Policy Group to become operating procedure for the county. There is also a technical sub-committee to the Operations Group consisting of technical personnel from the member localities that advise the Operations and County Policy Group on technical matters related to the systems and protocols.

In summary the Core Group works closely with Saint Charles County Policy Group to ensure that any opportunity to improve the effectiveness and efficiency of emergency communications is coordinated with local, county, state and federal emergency response agencies.

Background

St. Charles County, and local entities contained, have current radio systems based on vintage conventional communications system architecture. These older systems are also using a significant number of VHF frequency channels that were allocated when the systems were initially installed meanwhile the number of radio users and system requirements have increased expediently throughout the County.

These congested outdated systems frequently experience routine severe radio congestion and that forces agencies to limit access to these capacity stressed systems. This then limits interoperability with public service and public safety organizations in the region due to the limited capacity of the existing channels.

In addition, the county will start a parallel evaluation process by which they will identify the VHF and UHF frequencies that will be decommissioned and returned to the pool following the cutover to the new county-wide system. The evaluation process will also identify the limited number of frequencies that will retained for mutual aid and operational requirements.

Current Status

Saint Charles County has secured funding for implementing a county-wide system to support all agencies that operate within the County, with capacity to support regional interoperable communications to the systems for all St Louis Regional Communication participants. On April 7, 2009, Saint Charles County passed a dedicated sales tax to fund the development of this new interoperable communications system. A radio consultant was retained to work with Saint Charles County to develop system specifications that were included in the request for proposal from radio equipment vendors that was released on February 1, 2010. The specifications are currently in draft review prior to release.

Proposed Extended Implementation Schedule

2010	
1 st Quarter	Radio Specifications RFP released
3 rd Quarter	Radio System RFP response due
4 th Quarter	Review & Evaluation Initiated
2011	
1 st Quarter	Bid Evaluation Completed and Contract Awarded

2 st Quarter	Saint Charles County Contract Awarded
3 rd Quarter	Site Development Begins
4 th Quarter	System Factory Staging and Acceptance
2012	
1 nd Quarter	Fixed Base Installation Begins
3 rd Quarter	Installation Completed – Subscriber testing begins
4 th Quarter	Initiate final system acceptance testing
2013	
1 st Quarter	Install subscriber units into countywide public safety fleet
2 nd Quarter	General Acceptance Testing and system cutover
3 rd Quarter	System burn-in
4 th Quarter	Abandon Legacy frequencies

Summary

The rules, 47CFR 90.625, provides that specific conditions must be met to attain extended implementation status. The time table schedule details the planned approach to the construction of the system. Specifically, in Paragraph (a)(1), due to the purpose, size, and complex nature of the proposed system, which is comprised of eight major governmental entities and numerous smaller public safety entities, as well as covering two states, a one-year period of time to implement channels isn't feasible. Extremely large systems routinely take the full five-years allowed under Section 90.629 of the Commission's rules and in fact there have been instances that those systems have taken even longer than the Commission's rules permit. Further, in Paragraph (a)(2), the County of Saint Charles system is part of a coordinated and integrated wide area system, which will require more than 12 months to purchase, construct and place into operation. The County has passed the funding hurdle and is moving toward the purchase of the new 800 MHz system.

The St. Louis Regional Communications Core Group has been moving forward on all fronts, from working with Regional Planning Committees for additional spectrum, to passing county tax funding initiatives, to working in the development a state of the art interoperability system to serve all jurisdictions.

Therefore, with good cause shown, it is in the public interest, convenience and necessity to grant the subject request for extended implementation. Such extended implementation authority is in the public interest and will foster the development of total interoperability in the St Louis Urban Area Security Initiative plan.

The county and Public Safety entities with the respective entities will return the VHF frequencies no longer required to support mutual aid and specific operational requirements