



Spokane Regional Emergency Communications Systems

1121 W Gardner Ave
Spokane, WA 99201
(509) 477-5763 · Fax: (509) 477-3724

April 30, 2012

Federal Communications Commission
Public Safety and Homeland Security Bureau, Policy Division
445 12th St., S.W.
Washington, D.C. 20554

Dear Communications Commission:

Regarding: Amendment to request for waiver of 12/31/12 narrowbanding deadline

Overview

Pursuant to the guidelines issued in the Public Notice, DA-11-1189, Spokane Regional Emergency Communications Systems (SRECS) submitted a request for a waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. Subsequently the FCC released Public Notice DA-12-246 providing supplemental guidance to licensees seeking waivers of the Federal Communications Commission's January 1, 2013 deadline for private land mobile radio systems in the 150-174 MHz and 421-512 MHz (VHF/UHF) bands to migrate to narrowband (12.5 kHz or narrower) technology.

Specifically, the FCC recommends that licensees seeking waivers ensure that their submissions are amended to include, a definitive list of the frequencies for which they are seeking a waiver, a list of frequencies that will be relinquished, and representations from all licensees covered by the waiver request that they have committed to take any actions that form the basis for the waiver justification.

Frequencies to be included in Waiver

SRECS has updated the list of call signs that was originally provided as Appendix B to show that all specific frequencies for the call signs listed are to be included in the waiver request. Please see revised Appendix B included with this amendment.

Spectrum to be relinquished

The applicants plan to migrate to an 800 MHz county-wide trunking environment. VHF/UHF channels will no longer be used for primary communications by agencies transitioning to 800 MHz. A select subset of VHF/UHF channels presently used for primary radio system operation will be repurposed for use as a county-wide narrowband VHF/UHF interoperability infrastructure and will be tied to the new P25 system. Any remaining unused VHF/UHF frequencies would be relinquished to the FCC. Because the final design of the VHF/UHF interoperability infrastructure is still being finalized, specific details concerning the number of frequencies to be returned to the Commission have not yet been established.

The relinquished frequencies will become available once the entire system has been implemented and the user agencies have transitioned safely over to the 800 MHz county-wide trunking environment. The timing of this transition will depend on site construction and agency transition schedules. It is expected that this could take between six months and one year after the construction of the new system.

Conclusion

It is with all of the included information in mind that the signatories submit this modification to the original waiver request dated 1/27/2012, and are hereby committed to take any actions that form the basis for this waiver justification.

Included with this amendment to the waiver, please find representations from all other licensees covered by the waiver request, along with a definitive list of call signs/frequencies for which they are seeking a waiver (Revised Appendix B). This should replace the previously submitted list of call signs. The parties agree to provide a list of frequencies that will be relinquished to the FCC as an additional amendment to this waiver request within six months of approval of the waiver request by the FCC.

Sincerely,

A handwritten signature in black ink, appearing to read 'R. Lincoln', written in a cursive style.

Robert Lincoln
SRECS Director

Updated Appendix B

<u>Call Sign</u>	<u>Name</u>	<u>FRN</u>	<u>Frequency</u>
KA77659	SPOKANE COUNTY FIRE PROTECTION DIST 10	19039833	All
KA77660	SPOKANE COUNTY FIRE PROTECTION DIST 10	19039833	All
KB41440	SPOKANE, COUNTY OF	19039833	All
KB61637	SPOKANE, COUNTY OF	19039833	All
KE4181	SPOKANE, COUNTY OF	19039833	150-174 MHz Only
KL9475	SPOKANE, COUNTY OF	19039833	All
KLX208	SPOKANE, COUNTY OF	19039833	All
KLY956	SPOKANE, COUNTY OF	19039833	All
KNCC467	SPOKANE, COUNTY OF	19039833	All
KNIT863	SPOKANE, COUNTY OF	19039833	All
KNJN828	SPOKANE, COUNTY OF	19039833	All
KOK501	SPOKANE COUNTY FIRE DISTRICT 1	19039833	150-174 MHz Only
KR4255	SPOKANE, COUNTY OF	19039833	All
KUB771	SPOKANE, COUNTY OF	19039833	All
KY2964	SPOKANE, COUNTY OF	19039833	All
WBV857	SPOKANE COUNTY FIRE DISTRICT 3	19039833	All
WNBA482	SPOKANE, COUNTY OF	19039833	All
WNBX916	SPOKANE, COUNTY OF	19039833	All
WNFF982	Spokane Regional Emergency Communcation System	19039833	All
WNFU451	AIRWAY HEIGHTS, CITY OF	19039833	All
WNGR551	SPOKANE COUNTY FIRE DISTRICT 9	19039833	All
WNGY555	Spokane Regional Emergency Communication	19039833	All
WNHW951	Spokane County	19039833	All
WNIW728	SPOKANE, CITY AND COUNTY OF	19039833	All
WNJG993	SPOKANE, COUNTY OF	19039833	All
WNNF302	SPOKANE, COUNTY OF	19039833	All
WNPA557	SPOKANE, COUNTY OF	19039833	All
WNPB939	SPOKANE, COUNTY OF	19039833	All
WNR209	SPOKANE, COUNTY OF	19039833	All
WNSG940	SPOKANE, COUNTY OF	19039833	All
WNVB931	SPOKANE Regional Emergency Communication	19039833	All
WNVN278	SPOKANE, COUNTY OF	19039833	All
WNWC554	Spokane Regional Emergency Communication	19039833	All
WNWC558	Spokane Regional Emergency Communication	19039833	All

<u>Call Sign</u>	<u>Name</u>	<u>FRN</u>	<u>Frequency</u>
WNXS951	Spokane Regional Emergency Communication	19039833	All
WPGD767	SPOKANE COUNTY FIRE DISTRICT 8	19039833	All
WPGQ928	SPOKANE COUNTY FIRE DISTRICT NO 9	19039833	All
WPKL609	SPOKANE, COUNTY OF	19039833	All
WQEX788	SPOKANE, COUNTY OF	19039833	All
WQF250	SPOKANE, COUNTY OF	19039833	All
WQLF595	SPOKANE, CITY AND COUNTY OF	19039833	All
WQNR397	SPOKANE REGIONAL EMERG. COMMUNICATIONS SYSTEM	19039833	All
WXK646	SPOKANE, COUNTY OF	19039833	All
WZJ436	County of, Spokane	19039833	All
WZX496	SPOKANE, COUNTY OF	19039833	All
WZX497	County of, Spokane	19039833	All
WZY319	SPOKANE, COUNTY OF	19039833	All
KB28028	SPOKANE, CITY OF	1562958	All
KB51032	SPOKANE, CITY OF	1562958	All
KLE739	SPOKANE, CITY OF	1562958	All
KOA370	SPOKANE, CITY OF	1562958	All
KOB246	SPOKANE, CITY OF	1562958	All
WNAA594	SPOKANE, CITY OF	1562958	All
WNKE585	SPOKANE, CITY OF	1562958	All
WNSY451	SPOKANE, CITY OF	1562958	All
WNVL396	SPOKANE, CITY OF	1562958	All
WQCK312	SPOKANE, CITY OF	1562958	All
WPAN379	SPOKANE COUNTY F P D 1	5757612	All
WNKI993	SPOKANE COUNTY FIRE DISTRICT 4	1582642	All
WPHU864	SPOKANE COUNTY PARKS & REC	13371273	All
WPQB870	SPOKANE COUNTY FIRE DISTRICT 3	9735267	All
WQEX453	SPOKANE COUNTY FIRE DISTRICT #5	20735783	All
KNIE527	SPOKANE, COUNTY OF		All



City of Airway Heights
1208 S. Lundstrom
Airway Heights, WA 99001
(509) 244-5429

4/03/2012

Request for waiver of the Dec 31, 2012 narrowbanding deadline

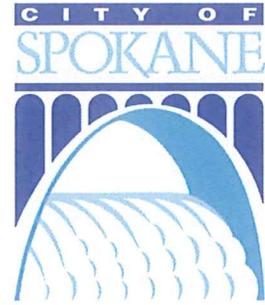
Spokane Regional Communications Systems (SRECS) filed waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on 1/27/2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

City of Airway Heights call sign WNFU451 has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Wayne Parks
City of Airway Heights Public Works
Technician

City of Spokane
808 W. Spokane Falls Boulevard
Spokane, Washington 99201



March 28, 2012

Request for waiver of the Dec 31, 2012 narrowbanding deadline

To Whom It May Concern:

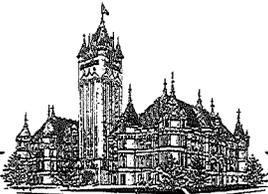
Spokane Regional Communications Systems (SRECS) filed waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on 1/27/2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

The City of Spokane, Washington has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

A handwritten signature in blue ink, appearing to read "Bob Wentworth". The signature is fluid and cursive, with a long horizontal stroke at the end.

Bob Wentworth
Regional Communications Infrastructure Manager

S P O K A N E  C O U N T Y

SPOKANE REGIONAL EMERGENCY COMMUNICATIONS SYSTEMS

1121 W. GARDNER AVE.
SPOKANE, WA 99201
(509) 477-5763 - FAX (509) 477-2450

Request for waiver of the Dec 31, 2012 narrow banding deadline

Spokane Regional Communications Systems (SRECS) filed waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on 1/27/2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

Spokane County Frequencies has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

SRECS System Manger



Chuck Chisholm



SPOKANE VALLEY FIRE DEPARTMENT

Est. 1940

Mike Thompson, Fire Chief
2110 E Wilbur Avenue
Spokane Valley, WA 99206
Phone (509) 928-1700
FAX (509) 892-4125
www.spokanevalleyfire.com

Request for waiver of the Dec 31, 2012 narrowbanding deadline

Spokane Regional Communications Systems (SRECS) filed waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on 1/27/2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

Spokane Valley KOK501 has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Handwritten signature of Mike Thompson in cursive script.

Mike Thompson
Fire Chief
Spokane Valley Fire Department

Handwritten date 'April 16, 2012' in cursive script.



SPOKANE COUNTY FIRE DISTRICT #3

April 12, 2012

Request for waiver of the Dec 31, 2012 narrowbanding deadline

Spokane Regional Communications Systems (SRECS) filed waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on 1/27/2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

Spokane County Fire District #3 call WBV857 has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

A handwritten signature in black ink, appearing to read "B. K. Jennings", written over a horizontal line.

Brian K Jennings, Deputy Chief

May 1, 2012

To Whom It May Concern:

RE: Request for Waiver of the December 31, 2012 Narrow-Banding Deadline

Spokane Regional Communications Systems (SRECS) filed for a waiver of the January 1, 2013 deadline for transitioning to Narrow-Band operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on January 27, 2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

Spokane County Fire District 4—**WNKI 993**—has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Respectfully,



Joe A. Krizanic

Deputy Chief



17217 W. Four Mound Rd.
Nine Mile Falls, WA 99026
509-796-4793 office phone
509-796-3473 office fax
509-981-8295 Sec. Cell
c.harrington@scfd5.org
www.scfd5.org website

4/11/2012

Request for waiver of the Dec 31, 2012 narrowbanding deadline

Spokane Regional Communications Systems (SRECS) filed waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on 1/27/2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

Spokane County Fire District #5 call sign WQEX453 has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

A handwritten signature in cursive script that reads 'Bonnie Cobb'.

Bonnie Cobb, Fire Chief



SPOKANE COUNTY
Fire Protection District 8
12100 EAST PALOUSE HIGHWAY
POST OFFICE BOX 345
VALLEYFORD, WASHINGTON 99036
(509) 926-6699 • FAX: 924-8358

COMMISSIONERS

Lee C. Boling
Gregory A. Hesse
Dennis L. Ross

FIRE CHIEF

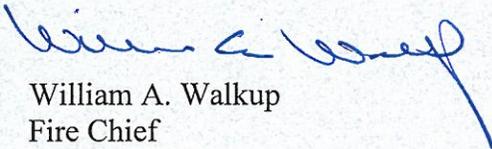
William A. Walkup

Request for waiver of the Dec 31, 2012 narrowbanding deadline

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Spokane County Fire District 8, WPGD767 has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,



William A. Walkup
Fire Chief



FIRE & RESCUE

CARING FOR YOUR FAMILY, HOME AND COMMUNITY

April 10, 2012

Request for waiver of the December 31, 2012 narrowbanding deadline

Spokane Regional Communications Systems (SRECS) filed waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on January 27, 2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

Spokane County Fire 9 (WNGR551, WPGQ928) has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robert I. Anderson', written over a white background.

Robert I. Anderson
Fire Chief



FireDistrict 10

Serving the West Plains

To Whom it may Concern :

Request for waiver of the Dec 31, 2012 narrow banding deadline

Spokane Regional Communications Systems (SRECS) filed waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. The waiver request was filed with the FCC on 1/27/2012. In addition, SRECS is filing the attached amendment as recommended by the FCC in DA 12-246.

Spokane County Fire # 10 call sign KA77659, KA77660 has been involved with this process and would like to be included in the waiver as outlined in the waiver request and attached amendment. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

A handwritten signature in blue ink that reads "Nick Scharff". The signature is written in a cursive style and is positioned above the printed name and title.

Nick Scharff
SCFD10 Fire Chief