

In the Matter of: )  
 )  
Regional Public Safety Partners in Pierce ) WT Docket No. 99-87  
County, Washington request for waiver of ) Public Notice DA 12-246  
section 90.209(b) of the commission’s rules )

## **REQUEST FOR WAIVER OF NARROWBANDING DEADLINE IN PIERCE COUNTY, WA**

### **1 Introduction**

#### ***1.1 Overview***

In regards to FCC WT Docket No. 99-87, and pursuant to the guidelines issued in the Public Notice, DA-11-1189, the signatories to this document respectfully requests a one-year waiver from the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands. This Rule Waiver is being requested in order to implement a cost effective and operationally safe transition from existing individual VHF/UHF systems to a 700/800 MHz county-wide trunking environment made possible through recent voter approved funding for radio communications upgrades and expansion.

#### ***1.2 Background***

Presently, the public safety agency licensees in Pierce County have their own disparate radio communication systems utilizing 700/800 MHz and VHF/UHF channels. The Metropolitan Public Safety Communication Steering Committee, which includes these and other Pierce County public safety agencies, has been meeting since 2005 developing a technical and financial plan to eliminate the disparate systems, improve interoperability as well as meet the 2013 narrowbanding deadline.

In November 2011, the voters in Pierce County Washington approved Propostion 1, an initiative that established a single county-wide entity identified as “South Sound 911”. South Sound 911 is charged with consolidating four dispatch centers into two regional communications centers and providing funding to upgrade/consolidate existing disparate Public Safety radio communications systems in the county. Proposition 1 established a 0.1% sales tax to provide funding for the dispatch center consolidation and radio system upgrades. South Sound 911 plans to transition to a 700/800 MHz county-wide trunking environment for primary communications that will provide interoperable communications to member agencies within Pierce County.

Proposition 1 has created the opportunity to resolve long-standing officer safety and communications interoperability challenges through development of a single, harmonized public safety communications environment throughout Pierce County. In addition to finalizing the radio system upgrades and expansions needed, South Sound 911 is working through the governance and financial challenges present when establishing any new governmental consortium.

The Pierce County Sheriff's Department had planned to migrate from their existing VHF/UHF radio systems to an upgraded 700 MHz radio system currently owned by Pierce Transit, creating a jointly operated Pierce County/Pierce Transit system. Due to financial limitations, West Pierce Fire Communications (Fire Comm) had planned to narrowband and remain on their existing VHF/UHF radio systems. With the passage of Proposition 1, the Pierce County/Pierce Transit system will be expanded to support needed coverage and capacity upgrades and function as a jointly owned and operated system. This joint system, along with the existing 800 MHz City of Tacoma /City of Puyallup system, will knit together most public safety agencies in Pierce County, allowing the licensees to migrate from their existing VHF/UHF radio systems.

Additionally, with the passage of Proposition 1, there are now adequate financial resources for City of Tacoma and City of Puyallup, who have been jointly operating an 800 MHz trunked radio system in Pierce County, to also upgrade their system to P25. This work will be done in concert with Pierce County, Pierce Transit and surrounding Pierce County agencies. The ultimate goal is to create a P25 700/800 MHz county-wide trunking environment to support all government agencies seeking access to high performance interoperable communications in Pierce County.

Due to the changing environment created by the passage of Proposition 1, the narrowbanding schedule has been adversely affected and agencies are concerned that they will be required to cease wideband operation on their existing VHF/UHF channels before they have safely transitioned users to 700/800 MHz. Many Public Safety agencies in Pierce County have shifted their limited financial and staff resources to focus on the upgrade and expansion of the 700/800 MHz systems and the transition of users off of the wideband VHF/UHF radio systems. The intention is to cease operations on the majority of the VHF/UHF channels. Pursuant to C.F.R Part 1, Section 1.925, it would be contrary to the public's best interest to expend financial, technical and administrative resources upgrading existing VHF/UHF equipment in Pierce County prior to the 2013 deadline, when the plan is to largely vacate those same VHF and UHF systems.

It is critical for Public Safety agencies in Pierce County to operate on their existing wideband VHF/UHF channels during the development, deployment, transition and training phase associated with the new systems.

As a result, the signatories of this document request a one-year extension of the deadline for transition to narrowband channels. We are confident that a one-year extension of the deadline will allow sufficient time for Pierce County agencies to work through their challenges and transition the VHF/UHF users over to the new system.

## 2 Waiver Request Information

### 2.1 Summary

As outlined in the guidelines issued in the Public Notice, DA-11-1189, the following information addresses the factors relevant in assessing that this request has met the Commission's waiver standard under C.F.R. Part 1 Section 1.925.

#### 1 Steps already taken to plan for, initiate, and complete the transition to narrowband operations:

Prior to the passage of Proposition 1, individual agencies within Pierce County were working towards meeting the narrowbanding deadline on their own. The prior plan was for each agency to upgrade or replace their own radio equipment to support narrowband operations as necessary. Once all Public Safety agencies in Pierce County were ready, all agencies would cutover to narrowband operations in a coordinated fashion in order to maintain officer and firefighter safety and effective interoperable communications within the county through the transition.

Some interoperable statewide VHF/UHF systems such as Law Enforcement Radio Network (LERN), On Scene Command and Coordination Radio (OSCCR), Hospital Emergency Administrative Radio (HEAR) and REDNET are on track to be narrowbanded by the 2013 deadline. These frequencies are not part of this waiver request.

Pierce County, Pierce Transit, City of Tacoma and City of Puyallup are developing a detailed design for the expanded 700/800 MHz county-wide trunking environment, with vendor contracts eminent. Early deployment of new radios is planned once contracts are in place. The majority of the mobile and portable fleet will be narrowband compliant prior to the 2013 deadline.

#### 2 System size and complexity:

The current VHF/UHF environment in Pierce County consists of West Pierce Fire Communications (Fire Comm) which operates a nine site simplex VHF system, Pierce County Sheriff's Department which operates a seven site VHF system with a combination of repeaters and simplex operation, and numerous smaller VHF/UHF systems operated by Pierce County, Pierce Transit, and the cities of Tacoma, Puyallup, Fife, Buckley and Orting.

When fully implemented, there will be multiple large P25 trunked sub-networks forming a single county-wide public safety interoperable communications environment. The county-wide network will have eight sites for the City of Tacoma 800 MHz system, five sites for the City of Puyallup 800 MHz system, and twelve for the Pierce County/Pierce Transit 700 MHz system.

In addition, there will be a narrowband VHF simulcast/multicast system, a potential narrowband UHF system, and 700 MHz interoperability repeaters for mutual aid with regional agencies. This is a complex system that requires development of entirely new facilities and complete reconstruction of others.

3 Whether system equipment is narrowband-capable or must be replaced or upgraded:  
Agencies in Pierce County plan to transition the majority of the area's first responder users off of the existing VHF/UHF systems and over to the 700/800 MHz county-wide trunking environment. A significant amount of the existing VHF/UHF system equipment is not narrowband capable. Since equipment that is not narrowband capable does not interoperate with narrowbanded equipment, and improved frequency stability is required by FCC Rule, the entire system has to be upgraded to narrowband capable equipment. The existing system cannot be partially narrowbanded. Any effort to upgrade the existing system to narrowband capability would derail the current process of migrating users over to the 700/800 MHz county-wide trunking environment.

4 Whether the licensee plans additional system upgrades or improvements in addition to converting to narrowband operation:

The plan is to migrate the majority of the public safety communications in Pierce County to the 700/800 MHz county-wide trunking environment. There are no plans to upgrade or improve their existing individual VHF/UHF networks. A limited number of VHF/UHF channels are being retained for mutual aid interoperability with regional agencies.

5 Funding sources, including whether the licensee's budget requires government approval or a multi-year budget process:

Pierce County voters approved Proposition 1 which calls for a 0.1% sales tax increase in November of 2011. Collection of this tax will begin in 2012. This tax revenue source is specifically allocated to funding radio communications and 911 dispatch facilities.

6 Whether the licensee's narrowbanding schedule is affected by neighboring systems due to interoperability relationships or other interdependencies:

Agencies that require interoperation with other nearby local state or Federal agencies will be provided with narrow band mobile and portable radios during 2012. These fleet upgrades will be complete prior to January 1, 2013. Because of this early deployment of mobile and portable radios, there are no significant interdependencies with neighboring systems that impact the schedule.

7 Plans to minimize the negative impact of extended wideband operations on co-channel and adjacent channel operations, including a description of the spectrum environment in the affected area:

The signatories to this Waiver request plan to minimize the potential for negative impacts on co-channel and adjacent channel operations by transitioning users off of the VHF/UHF channels and turning them off as soon as is reasonable and prudent. The goal of current county-wide planning effort is to complete this transition in 1 to 1.5 years, though a one-year waiver period is being requested in order to be prudent and allow for unforeseen circumstances. If there are specific co-channel or adjacent channel issues that arise, the signatories to this waiver request will work to address any harmful interference and seek to transition users off of those channels first.

- 8 If the licensee plans to migrate to a non-VHF/UHF band (e.g., 700 MHz or 800 MHz), whether it will relinquish VHF/UHF spectrum once it has migrated and the amount of spectrum to be relinquished:

The applicants plan to migrate to a 700/800 MHz county-wide trunking environment. VHF/UHF channels will no longer be used for primary communications by agencies transitioning to 700/800 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 switches. Any remaining unused VHF/UHF frequencies would be relinquished to the FCC. Because the final design of this interoperability infrastructure has just begun, specific detail 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 700/800 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.

### **3 Conclusion**

It is with the all of the included information in mind that the signatories respectfully request a one-year extension to the January 1, 2013 narrowbanding deadline, and are hereby committed to take any actions that form the basis for this waiver justification.

Included with this waiver request, please find representations from all licensees covered by the waiver request (Appendix A), along with a definitive list of frequencies for which they are seeking a waiver (Appendix B). The parties agree to provide a list of frequencies that will be relinquished to the FCC as an amendment to this waiver request within six months of acceptance of this waiver request by the FCC.

Sincerely,

*\*Signature Blocks for each entity have been submitted as separate attachments.*

## Appendix A

### Licensees Included In This Waiver Request

Licensee Name	Licensee FRN	Signature Page
TACOMA, CITY OF	1562909	✓
PIERCE COUNTY FIRE DISTRICT 26	1570381	✓
PIERCE COUNTY FIRE DISTRICT 23	1571751	✓
PIERCE COUNTY FIRE DISTRICT 20	1572148	✓
DUPONT, CITY OF	1575521	✓
GIG HARBOR, CITY OF	1577089	✓
FIRCREST, CITY OF	1577147	✓
EATONVILLE, TOWN OF	1577196	✓
BUCKLEY, CITY OF	1577352	✓
PIERCE COUNTY FIRE DISTRICT 18	1577741	✓
BONNEY LAKE, CITY OF	1579119	✓
GRAHAM FIRE & RESCUE, COUNTY OF PIERCE	1581461	✓
PIERCE COUNTY FIRE DISTRICT 8	1581560	✓
West Pierce Fire & Rescue	1581578	✓
West Pierce Fire & Rescue	1581636	✓
PIERCE TRANSIT	1585017	✓
BUCKLEY, CITY OF	4520789	✓
BUCKLEY, CITY OF	4520805	✓
SUMNER, CITY OF	4521092	✓
PIERCE COUNTY FIRE PROT DIST 12	4524708	✓
FIFE, CITY OF	5754445	✓
West Pierce Fire & Rescue	5758727	✓
PIERCE, COUNTY OF	6060149	✓
CENTRAL PIERCE FIRE PROTECTION DISTRICT 6	6270383	✓
TACOMA, CITY OF	6321830	✓
PIERCE COUNTY FIRE DISTRICT 5	9985201	✓
PIERCE COUNTY FIRE DISTRICT 13	10493435	✓
PUYALLUP, CITY OF	11315082	✓
PIERCE COUNTY FIRE DISTRICT #25	13074968	✓
SUMNER, CITY OF	13636998	✓
PIERCE COUNTY FIRE DIST 14	14027346	✓
PIERCE COUNTY AIRPORT	14175798	✓
PIERCE, COUNTY OF	15514482	✓
ORTING POLICE DEPARTMENT	16874596	✓
PIERCE COUNTY SHERIFF'S DEPARTMENT	19850858	✓

## Appendix B

### Existing VHF/UHF Licenses

Call Sign	Licensee Name	License FRN	Frequency
WNCW524	BUCKLEY, CITY OF	4520789	ALL
KVA319	BUCKLEY, CITY OF	4520805	159.09
KOA972	CENTRAL PIERCE FIRE PROTECTION DISTRICT 6	6270383	ALL
WPSN349	CITY OF GIG HARBOR	1577089	ALL
KOF221	City of Tacoma	1562909	ALL
WNHJ671	CITY OF TACOMA	6321830	ALL
WRU859	DUPONT, CITY OF	1575521	ALL
KOK458	EATONVILLE, TOWN OF	1577196	ALL
KTS776	FIFE, CITY OF	5754445	ALL
KJF797	FIRCREST, CITY OF	1577147	ALL
KNFC599	Gig Harbor, City of	1577089	ALL
KNCL517	GIG HARBOR, CITY OF	1577089	ALL
KDV657	GRAHAM FIRE & RESCUE, COUNTY OF PIERCE	1581461	ALL
WQHT617	ORTING POLICE DEPARTMENT	16874596	ALL
WXY503	Pierce County	6060149	ALL
WQMA347	Pierce County	6060149	ALL
WQFQ208	Pierce County	6060149	ALL
WQEY450	Pierce County	6060149	ALL
WQES897	Pierce County	6060149	ALL
WQEA684	Pierce County	6060149	ALL
WQDN364	Pierce County	6060149	ALL
WQBD245	Pierce County	6060149	ALL
WPZV507	Pierce County	6060149	ALL
WPZV503	Pierce County	6060149	ALL
WPZB949	Pierce County	6060149	ALL
WPYI897	Pierce County	6060149	ALL
WPXB748	Pierce County	6060149	ALL
WPRG300	Pierce County	6060149	ALL
WPPX942	Pierce County	6060149	ALL
WPMU560	Pierce County	6060149	ALL
WPIJ509	Pierce County	6060149	ALL
WNJJ410	Pierce County	6060149	ALL
WNJB884	Pierce County	6060149	ALL
WNFD631	Pierce County	6060149	ALL

<b>Call Sign</b>	<b>Licensee Name</b>	<b>License FRN</b>	<b>Frequency</b>
WNDZ313	Pierce County	6060149	ALL
WNAG888	Pierce County	6060149	ALL
WAZ668	Pierce County	6060149	ALL
WAE690	Pierce County	6060149	ALL
KYY938	Pierce County	6060149	ALL
KYD943	Pierce County	6060149	ALL
KWI719	Pierce County	6060149	ALL
KR3734	Pierce County	6060149	ALL
KOL566	Pierce County	6060149	ALL
KOB452	Pierce County	6060149	ALL
KNET718	Pierce County	6060149	ALL
KNDB840	Pierce County	6060149	ALL
KDL939	Pierce County	6060149	ALL
KDL938	Pierce County	6060149	ALL
KD39983	Pierce County	6060149	ALL
KD39671	Pierce County	6060149	ALL
KC3985	Pierce County	6060149	ALL
KC3711	Pierce County	6060149	ALL
KB87344	Pierce County	6060149	ALL
KB86231	Pierce County	6060149	ALL
KAW630	Pierce County	6060149	ALL
WQFU533	PIERCE COUNTY AIRPORT	14175798	ALL
WPIY683	PIERCE COUNTY FIRE DIST 14	14027346	ALL
KNIR647	PIERCE COUNTY FIRE DISTRICT #25	13074968	ALL
KNJE205	PIERCE COUNTY FIRE DISTRICT 13	10493435	ALL
KNIR648	PIERCE COUNTY FIRE DISTRICT 18	1577741	ALL
WQP829	PIERCE COUNTY FIRE DISTRICT 20	1572148	ALL
WPKG780	PIERCE COUNTY FIRE DISTRICT 23	1571751	ALL
KIC226	PIERCE COUNTY FIRE DISTRICT 23	1571751	ALL
WPUK474	PIERCE COUNTY FIRE DISTRICT 26	1570381	ALL
KOM829	PIERCE COUNTY FIRE DISTRICT 5	9985201	ALL
KOL355	PIERCE COUNTY FIRE DISTRICT 8	1581560	ALL
WNBZ820	PIERCE COUNTY FIRE PROT DIST 12	4524708	ALL
WQMF893	PIERCE COUNTY SHERIFF'S DEPARTMENT	19850858	ALL
WRA282	PIERCE TRANSIT	1585017	ALL
WQMD762	PIERCE, COUNTY OF	6060149	ALL
WQFW208	PIERCE, COUNTY OF	15514482	ALL
KOI954	PUYALLUP CITY OF	11315082	ALL

<b>Call Sign</b>	<b>Licensee Name</b>	<b>License FRN</b>	<b>Frequency</b>
WPDD345	PUYALLUP, CITY OF	11315082	ALL
WNVC741	PUYALLUP, CITY OF	11315082	ALL
WNEB210	PUYALLUP, CITY OF	11315082	ALL
KOA621	PUYALLUP, CITY OF	11315082	ALL
WPYE626	PUYALLUP, CITY OF PUBLIC UTILITIES DISTRICT	11315082	ALL
WQEX786	West Pierce Fire & Rescue	1581578	ALL
KOB276	West Pierce Fire & Rescue	1581578	ALL
KD31707	West Pierce Fire & Rescue	1581578	ALL
KD25828	West Pierce Fire & Rescue	1581578	ALL
KD25348	West Pierce Fire & Rescue	1581578	ALL
KD21060	West Pierce Fire & Rescue	1581578	ALL
KB79506	West Pierce Fire & Rescue	1581578	ALL
WQBW570	West Pierce Fire & Rescue	1581636	ALL
KOK496	West Pierce Fire & Rescue	1581636	ALL
WPZY792	West Pierce Fire & Rescue	5758727	ALL
KWH593	BONNEY LAKE, CITY OF	1579119	ALL
WPBQ524	BONNEY LAKE, CITY OF	1579119	ALL
KNBD961	BONNEY LAKE, CITY OF	1579119	ALL
KOI860	BUCKLEY, CITY OF	1577352	ALL
KNDR818	EATONVILLE, CITY OF	1577196	ALL
KDZ383	SUMNER, CITY OF	4521092	ALL
WQEL214	SUMNER, CITY OF	4521092	ALL
KYV285	SUMNER, CITY OF	4521092	ALL
WPGE383	SUMNER, CITY OF	13636998	ALL

## **Appendix C**

### **Planned Narrowbanding Schedule**

November 2011: Proposition 1 passed in Pierce County

November 2011- March 2012: Final planning and coordination of county-wide 700/800MHz system and county-wide VHF/UHF overlay Mutual Aid System

March 2012- June 2013: Upgrade, construction and implementation of county-wide 700/800MHz system

June 2013 – September 2013: Construction and implementation of the county-wide VHF/UHF overlay Mutual Aid System.

June 2013- December 2013: Begin transition to 700/800MHz for VHF/UHF users and relinquish VHF/UHF frequencies as indicated in this waiver request after users have transitioned over safely

Chief  
James R. Bixler

Assistant Chief  
Jay Wiggins



Chairman  
Tom Huffar

Commissioners:  
Stephen Woolley  
Laura Worley

Phone: (253) 884-4040

12207 Lake Josephine Blvd.  
Anderson Island, WA 98303

Fax: (253) 884-4057

March 9, 2012

## **Request for waiver of the Dec. 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire Protection District No. 27 has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis of the waiver justification.

Sincerely,

James R. Bixler  
Fire Chief



## **Bonney Lake Police Department**

*Dana Powers, Chief of Police*

### **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

The City of Puyallup has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 be "D Powers".

***Dana Powers, Chief of Police***  
***18421 Old Buckley Hwy.***  
***Bonney Lake, WA 98391***  
***Ofc/253-863-2218 Cell/253-261-5212***  
**[powersd@ci.bonney-lake.wa.us](mailto:powersd@ci.bonney-lake.wa.us)**





## Pierce County Fire District 13

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4815 Wa-Tau-Ga Ave. N.E. • Browns Point, WA 98422  
(253) 952-4776 • (253) 925-8889

March 13, 2012

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

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire District 13 has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Gary D. McVay  
Fire Chief



**City of Buckley  
Fire Department**

Chief Alan Predmore

P.O. Box 1960  
151 South Cedar St.  
Buckley, WA 98321-1960

Phone: 360-829-1441  
Fax: 360-829-0133

Website: [www.cityofbuckley.com/fire](http://www.cityofbuckley.com/fire)

**Request for waiver  
of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

The City of Buckley Fire Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Alan Predmore  
Fire Chief  
City of Buckley



# Buckley Police Department

Chief James B. Arsanto

**March 14, 2012**

## **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Buckley Police Department and the City of Buckley have been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Chief James B. Arsanto



Town of Carbonado  
Fire Department  
(360) 829-0806  
(360) 829-0125

819 8<sup>th</sup> Avenue  
PO Box 91  
Carbonado, WA 98323

Alan Predmore, Fire Chief

## Request for waiver of the Dec 31, 2012 narrowbanding deadline

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

The Town of Carbonado Fire Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 "Alan Predmore".

Alan Predmore  
Interim Fire Chief  
Town of Carbonado



## Central Pierce Fire & Rescue

### Pierce County Fire District No. 6

17520 – 22<sup>nd</sup> Avenue East Tacoma, WA 98445

(253) 538-6400 (253) 537-7294 Fax

[www.centralpiercefirerescue.org](http://www.centralpiercefirerescue.org)

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March 12, 2012

### **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Central Pierce Fire & Rescue has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 'Keith Wright', is written over a horizontal line.

Keith Wright  
Deputy Chief  
Central Pierce Fire & Rescue

**Pierce County Fire District 25**  
**Crystal Mountain Fire Dept.**  
**32004 Crystal Mountain Blvd.**  
**Crystal Mountain, WA 98022**

**Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Crystal Mountain Fire Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Date April 6, 2012

A handwritten signature in blue ink, appearing to read "Alan Predmore", with a large, sweeping flourish extending to the right.

Chief Alan Predmore

*Authorized signatory in the temporary absence of Chief Michael Ferguson*



# DUPONT FIRE

March 26, 2012

## **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

The City of DuPont Fire Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Gregory E. Hull  
Fire Chief

City of DuPont Fire Department  
1780 Civic Drive, Suite 102  
DuPont, Washington 98327-9606  
253-912-5237



*"Where Compassion And Action Meet"*

March 21, 2012

## **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

East Pierce Fire & Rescue has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 "James Jaques", is written over the typed name.

James Jaques  
Assistant Chief  
East Pierce Fire & Rescue

East Pierce Fire & Rescue  
18421 Old Buckley Hwy  
Bonney Lake, WA 98391

## Eatonville Fire and EMS Department

### Request for waiver of the Dec 31, 2012 narrowbanding deadline

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Eatonville Fire and EMS Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Robert Hudspeth Fire Chief



# *Eatonville Police Department*

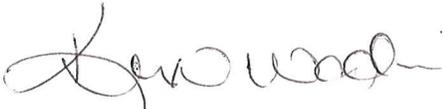
**P.O. Box 309 • 201 Center Street West  
Eatonville, Washington 98328  
360-832-6111 • Fax: 360-832-2093**

## **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Eatonville Police Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 "Kevin Wade". The signature is written in a cursive style with a large initial "K".

Kevin Wade  
Chief of Police



## Fife Police Department

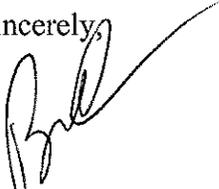
James M. Paulson Criminal Justice Center  
3737 Pacific Highway E. Fife, Washington 98424-1135  
Phone: (253) 922-6633 / Fax (253) 922-1220

### **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

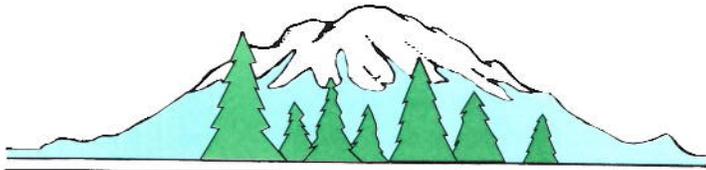
The Fife Police Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,



B. Blackburn  
Chief of Police

*"The department serves the people of Fife by providing law enforcement services in a professional and courteous manner, and it is to these people that the department is ultimately responsible."*



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## **THE CITY OF FIRCREST**

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115 RAMSDELL STREET • FIRCREST, WASHINGTON 98466-6999 • (253) 564-8901 • FAX (253) 566-0762

### **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

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

Sincerely,

Rick Rosenblatt  
City Manager



## **PIERCE COUNTY FIRE DISTRICT 23**

**Headquarters Station: 29815 SR 706 E. Ashford WA**

**P.O. Box 842 Elbe, Washington 98330**

**Phone: 360-569-2752 Fax: 360-569-2036**

**E-Mail: [pcfr23@centurytel.net](mailto:pcfr23@centurytel.net)**

**March 21, 2012**

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

**As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.**

**Pierce County Fire District # 23 has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 that reads "Garry Olson". The signature is written in a cursive style with a large initial "G".

**Garry Olson  
Fire Chief**



## Gig Harbor Fire & Medic One

March 12, 2012

### **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire District #5 has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

John E. Burgess  
Fire Chief  
Pierce County Fire District #5  
(Gig Harbor Fire & Medic One)



### **Request for waiver of the Dec 31, 2012 Narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

The City of Gig Harbor Police Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Mike Davis  
Chief of Police



# Pierce County Fire District 21

PO Box 369 • Graham WA 98338 • (253) 847-8811 • FAX (253) 847-2233

**Robert E. Skaggs**  
Commissioner

**Verne M. Pierson**  
Commissioner

**Gerald W. Gustafson**  
Commissioner

**Reggie Romines**  
Fire Chief

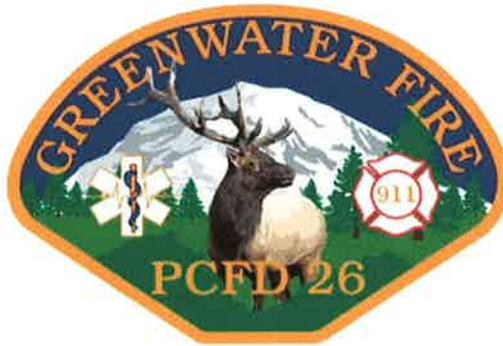
## Request for waiver of the Dec 31, 2012 narrowbanding deadline

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire Protection District No. 21 (Graham Fire & Rescue) has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Verne M. Pierson, Board Chairman  
Pierce County Fire Protection District No. 21



Pierce County Fire District 26  
59705 State Route 410 East  
Enumclaw, WA 98022

Phone 360-663-2522

## **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire District 26 has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Michael L. Smith  
Chairman of Commissioners

## PIERCE COUNTY FIRE PROTECTION DISTRICT 16

Fire Protection ♦ Rescue/Medical/Ambulance Services ♦ Public Education ♦ Fire Prevention



March 12, 2012

### **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire Protection District #16, the Key Peninsula Fire Department, has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 "Tom Lique", is written over a horizontal line.

Tom Lique, Fire Chief  
PCFPD#16



**WORKING TOGETHER**

Orting Valley Fire and Rescue  
P.O. Box 386  
Orting, Washington 98360  
Phone (360) 893-2221 Fax (360) 893-8524

3/12/2012

**RE: Request for waiver of the Dec 31, 2012 narrowbanding deadline**

To Whom it May Concern:

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire District #18 has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Paul R. Webb  
Chief - Orting Valley Fire and Rescue

**Orting Police Department**  
**POB 489**  
**401 Washington Avenue SE**  
**Orting, WA 98360**  
**Ph: 360-893-3111**  
**Fax: 360-893-3129**



March 21, 2012

## **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Orting Police Department has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 that reads "William E. Drake". The signature is written in a cursive style with a large, stylized initial "W".

Regards,  
William E. Drake  
Chief of Police

## Request for waiver of the Dec 31, 2012 narrowbanding deadline

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce Transit has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,



Raymon Hawkins  
Communications Program Assistant



# Pierce County

## Office of the County Executive

930 Tacoma Avenue South, Room 737  
Tacoma, Washington 98402-2100  
FAX (253) 798-6628  
www.piercecountywa.org

**PAT McCARTHY**

Executive  
(253) 798-7477  
pmccart@co.pierce.wa.us

**KEVIN R. PHELPS**

Deputy Executive  
(253) 798-7477  
kphelps@co.pierce.wa.us

March 29, 2012

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

Dear Communications Commission:

Pierce County, along with regional public safety partner agencies, is submitting a collective waiver request of the January 1, 2013 deadline for transitioning to narrowband operations in the affected VHF and UHF public safety radio networks. We have reviewed and understand the contents of the attached waiver request and were actively involved in its creation and we are committed to take the actions that form the basis for the waiver justification.

We are committed to provide the best possible radio communications services to our first responders so they can continue to effectively protect and serve our citizens and preserve public safety in our communities. Thank you for your consideration of our request.

Sincerely,

  
Pat McCarthy  
Pierce County Executive





## City of Puyallup

1100 39<sup>th</sup> Ave. SE – Building C  
Puyallup, WA 98371

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IT & Communications Department

(253) 841-5570 Fax (253) 841-5589

### **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

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

Sincerely,

Ron Tiedeman, Director IT & Communications

City of Puyallup  
1100 39th Ave. SE - Building C  
Puyallup, WA 98374

Phone: 253-840-6674  
Fax: 253-841-5589



## RIVERSIDE FIRE & RESCUE

PIERCE COUNTY FIRE PROTECTION DISTRICT NO. 14

4114 56TH AVE. E. • PUYALLUP, WA 98371-3663 • (253) 922-5644 • (253) 926-1136  
www.riversidefire.us

March 12, 2012

RE: WPIY683

### **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire District No. 14 dba Riverside Fire & Rescue has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Andrew B. McAfee, CFO  
Fire Chief



Pierce County  
FIRE PROTECTION DISTRICT NO. 17  
5403 340<sup>th</sup> Street East  
Eatonville, WA 98328  
HQ 253-847-4333  
FAX 253-262-3182



March 12, 2012

### **REQUEST FOR WAIVER OF THE DEC 31, 2012 NARROWBANDING DEADLINE**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

Pierce County Fire Protection District 17 has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

Bob Vellias  
Fire Chief





**CITY OF SUMNER**  
1104 Maple Street, Suite 140  
Sumner, Washington 98390-1423  
253.863.6384 • Fax: 253.299.5669

Police Department  
John Galle, Chief

**Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

The City of Sumner has reviewed this waiver request and would like to be included in the waiver as outlined in the appendices. We have reviewed and understand the contents, and are committed to take the actions that form the basis for the waiver justification. However, the City is requesting additional information regarding the frequencies that are to be either repurposed and those which are anticipated to be relinquished to the FCC and the impacts that such actions might have on the licenses currently held by the City of Sumner.

Sincerely,

A handwritten signature in cursive script, appearing to read 'John Galle', is written in black ink.

John Galle  
Chief of Police



City of Tacoma  
Fire Department

March 15, 2012

To Whom It May Concern:

**RE: Request for waiver of the December 31, 2012,  
narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, Washington area are submitting a collective waiver of the January 1, 2013, deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

The Tacoma Fire Department has been involved with the creation of this waiver request and would like to be included in the waiver, as outlined in the appendices. We have reviewed and understand the contents and are committed to take the actions that form the basis for the waiver justification.

Sincerely,

RONALD W. STEPHENS  
Fire Chief

RWS:mw  
Attachment



# WEST PIERCE FIRE & RESCUE

*Proudly serving the citizens of Lakewood and University Place*

3631 Drexler Drive West, University Place, WA 98466  
phone 253.564.1623 | fax 253.564.1629 | [www.westpierce.org](http://www.westpierce.org)

March 12, 2012

## **Request for waiver of the Dec 31, 2012 narrowbanding deadline**

As detailed in the attached waiver request, Public Safety agencies in the Pierce County, WA area are submitting a collective waiver of the January 1, 2013 deadline for transitioning to narrowband operations in the 150-174 MHz and 421-512 MHz bands.

West Pierce Fire & Rescue has been involved with the creation of this waiver request and would like to be included in the waiver as outlined in the appendices. 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 "Ken Sharp".

Ken Sharp  
Fire Chief  
West Pierce Fire & Rescue