



ADAMS COUNTY COMMUNICATION CENTER, INC.

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June 25, 2012

David S. Turetsky
Chief, Public Safety and Homeland Security Bureau
Federal Communications Commission
Washington D.C. 20554

Adams County, Colorado Wireless Broadband Interoperability Showing

Dear Mr. Turetsky:

On May 12, 2010, the Federal Communications Commission (“FCC”) issued order FCC 10-79 (“Waiver Order”) granting waivers for 21 jurisdictions to use the existing spectrum held by the Public Safety Spectrum Trust (“PSST”) to develop a Long Term Evolution (“LTE”) broadband data network for public safety first-responders. The Adams County Communications Center, Inc. Adams County, Colorado, (“ADCOM 911”) was one of those jurisdictions and subsequently entered into a de-facto lease with the PSST to utilize the spectrum. A requirement of the Waiver Order was that all jurisdictions file an Interoperability Showing specifying how their individual network would ensure interoperability with other public safety networks. Subsequent orders by the FCC have clarified and enhanced these requirements.

ADCOM 911 has since entered into a contract to develop an LTE system and is actively building its network. As such, ADCOM 911 submits the attached document as its Interoperability Showing as directed by the Waiver Order. We believe the document addresses all key issues raised by the FCC and illustrates our commitment to interoperability.

As this document contains both proprietary/trade secret information from its primary vendor Raytheon Corporation and their subcontractor IPWireless, Inc., and sensitive public safety information, we request this showing be treated under the confidential guidelines of the FCC as outlined in 47 CFR 0.459. Specifically, the Interoperability Showing contains the following information:

- **Sections 5, 10 and 11:** These sections contain proprietary and trade secret information for both Raytheon Corporation and IPWireless, Inc. and the release of this information would cause considerable competitive harm to these companies.
- **Appendix B & C:** This section contains sensitive public safety information including the specific location of eNodeB sites. The release of this information could compromise the security of the ADCOM 911 data network.

ADCOM 911, Raytheon Corporation and IPWireless, Inc. have safeguarded this information and it has not been publicly released to this point. ADCOM 911 requests to be notified of any outside request related to this information and that the information is held in confidence indefinitely. If this request for confidentiality is denied, ADCOM 911 request the documents be returned immediately.

Please feel free to contact me directly to discuss any aspect of this Interoperability Showing.

Sincerely,

A handwritten signature in cursive script that reads "Walter F. Leslie".

Walter F. Leslie
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