

In the Matter of

Ontario, County of)
)
Request for Waiver of the January 1, 2013)
narrowbanding deadline)
)

To: Chief, Public Safety and Homeland Security Bureau

Request for Waiver

Pursuant to Section 1.925 of the Federal Communications Commission's (the "Commission") rules, Ontario County New York (the "County") hereby submits a request for waiver of the January 1, 2013 narrowbanding deadline. The County is in the process of implementing a new 700 MHz P25 digital trunked public safety radio system, which will be utilized by all emergency response agencies within Ontario County. The County has already entered into contracts for the design and installation of this public safety radio system with Harris Corporation ("Harris".)

The County's new P25 digital trunked public safety radio system will replace the existing conventional wideband analog VHF and UHF stations currently in use by the County to dispatch and communicate with public safety agencies within Ontario County.

There is one primary factor which has impacted and has a high probability of further impacting the project schedule, pushing the cutover date for the new 700 MHz system beyond January 1, 2013. This factor includes, among other items, the following:

The County has been in the process of acquiring 700 MHz spectrum through the processes defined by Federal Communications Commission Regional Planning Committee 55 (Region 55). The County's application to Region 55 was approved in July of 2011, and received approval from the adjoining regions in October of 2011. The applications were then processed by the Forestry Conservation Coordination Association (FCCA) Frequency Coordinator, and were batch-filed to the FCC. As discussed below, the applications were returned for modification. The County has made the modifications and has received two (2) of the 12 original frequencies requested.

The County sits in close proximity to the Canadian border, and falls within Sharing Zone I, Sector 2 as defined by the "Sharing arrangement between the Department of Industry Canada and the Federal Communications Commission of the United States of America concerning the use of the frequency bands 764 to 776MHz and 794 to 806MHz by the Land Mobile Service along the Canada – United States Border".

Of the twelve (12) 25 kHz allocations originally assigned by the Computer Assisted Pre-coordination Resource and Database System (CAPRAD) to the Ontario County geographic area in the Region 55 frequency plan, only two (2) fall within the U. S. primary pool as defined by the 2005 Cross-Border Sharing agreement, and only one more of the frequencies assigned in the plan will be U.S. Primary when the updated treaty is ratified.

In order to license spectrum to complete construction of the system, the County will need to pursue ten additional U.S. primary 700 MHz channels. This will require the County to license channels that fall outside of the pool of frequencies currently assigned to the Ontario geographic area by CAPRAD and Region 55.

Securing these channels will require restarting a lengthy process with Region 55. The County will need to identify available U.S. primary spectrum that is currently allocated for other counties, develop interference studies which satisfy the Region 55 requirements, receive concurrence from neighboring counties whose CAPRAD assignments are being impacted and receive approval from the Region 55 technical committee. The County has worked with Region 55 to define a process whereby the County can license out of pool frequencies, but that process has taken several months to complete, and because of the need for inter-regional approvals, will likely take several more months before licenses are granted. While Region 55 representatives have committed to the County to explore out-of-pool opportunities in an expeditious manner, the delay in frequency acquisition has an extremely high probability of pushing the project completion schedule beyond January 1, 2013.

These unexpected delays in frequency acquisition will necessitate the continued operation of the current legacy VHF and UHF systems to accommodate the approximately 2,500 public safety and local government end users. While we optimistically plan for completion by January 1, 2013, we believe that it is prudent to consider all risks and potential roadblocks to an on-time system deployment. We are requesting a waiver until July 31, 2013 to allow for delays which may occur.

The information provided in this waiver request pertains to all County public safety agencies within Ontario County that plan to migrate to the planned 700 MHz trunking system. A list of the applicable Ontario County call signs for which this waiver would be applicable has been provided in Appendix A. This appendix also shows which of the licenses and frequencies will be retained, and which will be surrendered once the 700 MHz system is completed and accepted.

In DA 11-1189, released on July 13, 2011, the Commission provided guidance to licensees for the filing of waivers of the narrowbanding deadline. The Commission cited the requirements of FCC rules section 1.925¹ which states that waivers must demonstrate that “(i) the underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the waiver would be in the public interest; or (ii) in view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative.” Relative to the requirements of FCC rules section 1.925, the Commission recommended the following content for waiver requests:

- Steps already taken to plan for, initiate, and complete the transition to narrowband operations
- System size and complexity
- Whether system equipment is narrowband-capable or must be replaced or upgraded
- Whether the licensee plans additional system upgrades or improvements in addition to converting to narrowband operation
- Funding sources, including whether the licensee’s budget requires government approval or a multi-year budget process
- Whether the licensee’s narrowbanding schedule is affected by neighboring systems due to interoperability relationship or other interdependencies
- 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
- 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

¹ 47.C.F.R §§ 1.925(b)(3)

Further, the Commission has requested the following:

- What steps in the process have been or will be taken prior to January 1, 2013
- Anticipated dates of commencement and completion of:
 - Replacement or retuning of mobiles/portables
 - Infrastructure replacement or returning

The County has supplied applicable criteria for each of the above listed FCC recommendations for waiver content.

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

The County is well aware of the FCC requirements for licensees to migrate to narrowband operations. One of the driving factors behind the planned 700 MHz system is to satisfy narrowbanding requirements by permitting agencies to migrate off of legacy VHF and UHF spectrum. The County initially contracted with a consulting company to determine the best approach for satisfying the narrowbanding deadline. The results of that study determined that a new 700 MHz trunking system was the ideal technology to both satisfy the narrowbanding deadline and correct critical system deficiencies including coverage, capacity, and interoperability.

The County has entered into a contract with Harris Corporation for the design and installation of the County's new P25 digital trunked public safety radio system. Tower and site equipment procurement and installation is underway, and nearly completed. Harris has built, staged, and delivered RF equipment to the installation subcontractor. Equipment installation in the completed tower sites has commenced.

Pursuant to FCC rules section 1.925, the County has no other narrowbanding alternative than to proceed with the plans currently in place. Insufficient time exists to properly plan and execute an alternative approach that would satisfy the January 1, 2013 deadline. Such an approach would require additional funding and resources, which are not available in light of the present commitment to build out a 700 MHz trunked system. Any alternate approach would likely involve the ongoing use of conventional and simplex VHF and UHF equipment, which would not address critical communications deficiencies presently experienced within the County of Ontario. Therefore, an alternate approach would be inequitable, unduly burdensome, and contrary to the public interest.

System size and complexity

The County is comprised of roughly 644 square miles of land and 18 square miles of water. According to 2011 estimates by the US Census Bureau, the County's population is approximately 108,825. The County includes two cities, 16 towns, and 8 villages.

The legacy systems currently in place within Ontario County are comprised of approximately twenty (20) conventional VHF low band, VHF high band, and UHF simplex and repeater stations.

The proposed system will be a countywide simulcast trunked system utilizing fifteen (15) tower sites. Fourteen (14) of these sites will use 700 MHz frequencies, while the 15th will use 800 MHz frequencies that the County has been granted under callsign WQOF377. The system is designed to provide countywide portable hip-level coverage across a minimum of 95% of the county outdoors. The system will initially operate as a P25 Phase I system and is planned to be upgraded to P25 Phase II TDMA operations within a year following system acceptance. The system as designed by Harris will utilize 12 700 MHz frequencies allocated for the Ontario County geographic area through the Region 55 frequency allocation plan. These frequencies will be split between two simulcast cells. The system will support up to 2,500 subscriber radios within the first year of operation.

The County chose to use the 700 MHz band because of a lack of available frequencies in other bands and the expectation that frequencies allocated in the Regional Plan would be licensable. Because the County has chosen to deploy a 700 MHz system, that system must be trunked in accordance with 47 CFR 90.537(a). In addition, a countywide trunked simulcast P25 system was the only technology available that would adequately address the communications deficiencies experienced on the present conventional systems. Pursuant to FCC rules section 1.925, failure to build out the trunked system in lieu of another narrowbanding approach will be contrary to the public interest.

Whether system equipment is narrowband-capable or must be replaced or upgraded

The legacy VHF and UHF subscriber equipment and fixed infrastructure in use within the county is comprised of a wide mix of equipment. The current Sheriff's Office simulcast system is comprised of base stations that are not capable of being narrowbanded, and would require replacement if this waiver is denied. Much, but not all, of the existing subscriber equipment is able to be narrowbanded. However, none of this legacy equipment is capable of operating in the 700 MHz band.

VHF and UHF systems which are currently licensed to the County for Fire/EMS paging and alerting, Emergency Management, and interoperability, are not being replaced by the 700 MHz system at the outset and will be narrowbanded as part of the overall 700 MHz upgrade project. The current schedule calls for those systems to have the narrowbanding process completed by January 1, 2013.

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

The County's narrowband migration will consist of the implementation of an entirely new 700 MHz P25 Phase 1 simulcast trunked system, which will be upgraded to Phase 2 operation within a year of installation. The currently used VHF and UHF spectrum, with the exceptions shown in Appendix A, will be abandoned and, where not reused in a narrowband form, licenses will be returned to the FCC.

The proposed 700 MHz system will address critical deficiencies currently experienced on the present VHF and UHF conventional systems.

Several VHF and UHF components of the legacy conventional systems will be maintained for paging/alerting, Emergency Management and interoperability purposes. These stations will be upgraded with narrowbanding compliant equipment as a component of the 700 MHz project.

The system replacement is necessary to provide first responders with an effective and reliable communications system. Failure to provide the system in lieu of another narrowbanding alternative will be contrary to the public interest.

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

The planned 700 MHz P25 trunking system has been fully funded. The budget for the planned system was approved by the County Board of Supervisors in September 2010 when the contract was signed with Harris. The Ontario County Board of Supervisors entered into a contract with Harris Corporation on September 17, 2010. Harris will build the County's new 700 MHz radio network. A copy of Resolution No. 559-2010 awarding that contract is attached in Appendix B of this document. That resolution details the financial commitment of the County to the completion of this vital project.

In light of the County's funding commitment to build out a countywide 700 MHz trunked system, insufficient additional funding sources exist for the County to pursue an alternate approach that would assure compliance with the January 1, 2013 deadline. Such an approach would be inequitable, unduly burdensome or contrary to the public interest.

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

The County's narrowbanding schedule is affected by neighboring systems. Monroe County located immediately to the northwest of Ontario County which is the most populous County in the region is also in the process of implementing a 700 MHz trunked radio system. Monroe County is an important interoperability partner, and has also been negatively impacted by the current situation regarding 700 MHz frequency licensing. Other neighboring county systems currently operate VHF or UHF radio systems. The County will rely upon specific narrowband channels for interoperability purposes with these agencies. Gateway systems will be used where applicable to minimize any degradation experienced by cross communication between wideband and narrowband programmed radios. The County is actively communicating with interoperability partners to assure that interoperability is maintained throughout the narrowbanding transition and following the County's migration to 700 MHz.

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

For those neighboring agencies that will continue to operate VHF and UHF systems, co-channel interference problems are not expected to increase because of the transition to narrowband operations. Anticipated interference problems would likely be adjacent channel in nature.

The 7.5 kHz-offset adjacent channels in the VHF band have been available for quite some time, but have been treated by frequency coordinators as co-channel to adjacent wideband operations. Due to this treatment, no additional interference is anticipated from existing licensed stations. Potential interference from existing stations is anticipated to decrease as neighboring jurisdictions narrowband their equipment. Interference resulting from the extended use of wideband channels is only expected by new licensees operating in closer proximities than those distances currently permitted by frequency coordinators. The County will address these interference issues on a case-by-case basis, and will take all reasonable steps necessary to remedy the interference. These steps will include adjusting antenna patterns, reducing base station ERP, reducing mobile ERP, narrowbanding specific channels if the level of effort is manageable, or ceasing operation altogether.

The overall length of time the County will operate on wideband channels beyond January 1, 2013 is anticipated to be no longer than 12 months. Based on typical licensing times for new stations and typical system build-out periods of one year, the amount of time that any interference issues could be expected will be minimal.

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 County plans to migrate operational and tactical communications to the 700 MHz frequency band. Once the 700 MHz system has been accepted and cutover completed, most legacy VHF and UHF equipment will be decommissioned and the corresponding spectrum will be relinquished. A select number of VHF channels will be retained by the County for interoperability, Emergency Management, and Paging/Alerting purposes. A list of the applicable call signs and frequencies held by the County that will be relinquished if not reused following cutover to the 700 MHz system has been provided in Appendix A.

Narrowbanding Timetable

The County and Harris developed a detailed project schedule outlining the step-by-step implementation schedule. That original schedule, and an updated schedule showing the expected impacts of implementation delays is included as Appendix C of this document.

Pursuant to DA 11-1189, the following key dates have been provided:

<u>Milestone</u>	<u>Completion Date</u>
System Design Finalized	April 2011
Equipment Ordered	September 2011
Subscriber Units Deployed	Ongoing
Equipment Staging Completed	March 2012
Tower Sites Ready for Infrastructure Installation	To be completed by August 2012
Fixed Infrastructure Installed	Beginning June/July 2012
700 MHz Frequencies Licensed	Originally Planned for August/September 2012 Expected December 2012
System Testing Completed	Originally Planned for November 2012 Expected June 2013
System Cutover Completed	Originally planned for December 2012 Expected July 31, 2013

Authority to Grant the Requested Waiver

Section 1.925(b)(3) allows the Commission to grant waivers if the underlying purpose of the rule would not be served or would be frustrated by application of the rule in the instant case and/or in view of the unique circumstances, the application of the rule would be inequitable, unduly burdensome, or contrary to the public interest.²

The narrowbanding deadline was established as a means to mandate land mobile radio users to implement spectrally efficient technologies so that newly created channels could be effectively utilized. The County is currently implementing the most spectrally efficient technology available, in a P25 Phase II trunked simulcast TDMA system. The system, as

² 47.C.F.R §§ 1.925(b)(3)

proposed, will utilize 12 repeater frequencies. Mandating the County to adhere to the January 1, 2013 will require the County to abandon the planned 700 MHz trunking system and develop an alternate strategy to renew legacy VHF and UHF systems. This requirement would be contrary to the underlying purpose of the rule as the County would be forced to abandon a spectrally efficient design for a spectrally inefficient legacy system design.

The County has committed extensive time and resources into the current plan to build out a trunked 700 MHz system. The technology was identified as the optimum solution to address the critical deficiencies identified within the present communications systems. Should the system not be constructed as planned, first responders will be forced to continue to utilize communications systems that provide inadequate coverage, capacity, and interoperability. Based on the resources committed to the present project, it is not likely that an alternate narrowbanding approach could be developed that would satisfy the January 1, 2013 deadline. Therefore, application of the rule would be inequitable, unduly burdensome, and contrary to the public interest. In the instant case, the County has no other reasonable alternative than to proceed with the presently planned 700 MHz system.

Conclusion

The County has shown that granting of the requested relief would be in the public interest and would promote safety of life and property. The requested relief falls squarely under the provisions of Section 1.925(b)(3) of the Commission's rules. The Commission has the ability to grant this application and significantly improve the communications capabilities for the first responders within Ontario County. The County requests that the Commission find this request in the public interest and grant the application, as submitted.

Respectfully submitted,

A handwritten signature in blue ink, reading "Thomas J. Harvey". The signature is written in a cursive style with a large, sweeping flourish that loops back under the name.

APPENDIX A

VHF / UHF CALLSIGNS AND FREQUENCIES FOR WAIVER

FRN	Call Sign	Radio Service	Used By	Frequencies	Final Status	Include in Narrowbanding Waiver??
0003397650	KCI972	PW	HIGHWAY	151.01000	Retain	Yes
0003397650	KCI972	PW	HIGHWAY	156.07500	Retain	Yes
0003397650	KEB399	PW	Sheriff Channel 1 RX	154.81500	Surrender	Yes
0003397650	KEB399	PW	Sheriff Inter System	155.37000	Retain	Yes
0003397650	KEB399	PW	Sheriff Channel 3	155.85000	Surrender	Yes
0003397650	KEB399	PW	Sheriff Admin Paging - Gannett	156.09000	Surrender	Yes
0003397650	KEB399	PW	Sheriff Channel 1 TX	159.09000	Surrender	Yes
0003397650	KLD727	PW	FIRE	154.34000	Surrender	Yes
0003397650	KLD728	PW	FIRE	154.34000	Surrender	Yes
0003397650	WNAH590	PW	Sheriff / JAIL	155.13000	Retain	Yes
0003397650	WNAH590	PW	Sheriff / JAIL	156.01500	Retain	Yes
0003397650	WNYQ232	PW	EMS	155.17500	Retain	Yes
0003397650	WNYQ232	PW	EMS	155.20500	Surrender	Yes
0003397650	WNYQ232	PW	EMS	155.34000	Surrender	Yes
0003397650	WNYQ232	PW	EMS	155.35500	Retain	Yes
0003397650	WPAM869	PW	Sheriff	155.53500	Retain	Yes
0003397650	WPAM869	PW	Sheriff	155.97000	Retain	Yes
0003397650	WPAM869	PW	Sheriff	155.97000	Retain	Yes
0003397650	WPBN571	PW	Sheriff Paging	153.90500	Surrender	Yes
0003397650	WPBN571	PW	Sheriff Channel 2	158.95500	Surrender	Yes
0003397650	WPLX269	PW	Sheriff	154.81500	Surrender	Yes
0003397650	WPLX269	PW	Statewide Mutual Aid	155.37000	Retain	Yes
0003397650	WPLX269	PW	Sheriff	155.85000	Surrender	Yes
0003397650	WPLX269	PW	Sheriff	156.09000	Surrender	Yes

FRN	Call Sign	Radio Service	Used By	Frequencies	Final Status	Include in Narrowbanding Waiver??
0003397650	WPLX269	PW	Sheriff / Tactical	159.09000	Surrender	Yes
0005084603	KYW987	PW	FIRE	155.17500	Retain	Yes
0005084603	KYW987	PW	FIRE	155.20500	Retain	Yes
0005084603	KYW987	PW	FIRE	155.28000	Surrender	Yes
0005084603	KYW987	PW	EMS	155.34000	Retain	Yes
0005084603	KYW987	PW	FIRE/EMS	155.35500	Retain	Yes
0005084603	WPRR511	PW	FIRE	458.02500	Retain	Yes
0005084603	WQBN608	PW	FIRE	453.31250	Retain	Yes
0005084603	WQBN608	PW	FIRE	453.31250	Retain	Yes
0005084603	WQBN608	PW	FIRE	458.31250	Retain	Yes
0005084603	WQCN889	PW	FIRE	453.03750	Retain	Yes
0005084603	WQCN889	PW	FIRE	453.55000	Retain	Yes
0005084603	WQCN889	PW	FIRE	453.75000	Retain	Yes
0005084603	WQCN889	PW	FIRE	458.03750	Retain	Yes
0005084603	WQCN889	PW	FIRE	458.03750	Retain	Yes
0005084603	WQCN889	PW	FIRE	458.75000	Retain	Yes
0007484041	WPKV286	PW	Waste Mgmt	155.92500	Retain	Yes
0007484041	WPKV286	PW	Waste Mgmt	155.92500	Retain	Yes
0014360895	WQEQ291	PW	County Transportation	156.19500	Retain	Yes
0014360895	WQEQ291	PW	County Transportation	156.19500	Retain	Yes
0014360895	WQEQ291	PW	County Transportation	156.19500	Retain	Yes
0014360895	WQEQ291	PW	County Transportation	158.98500	Retain	Yes

APPENDIX B

ONTARIO COUNTY RESOLUTION No. 559-2010
AWARDING CONTRACT TO HARRIS CORPORATION

Ontario County

Board of Supervisors

Canandaigua, New York 14424

Supervisor Casella offered the following resolution and moved its adoption:

RESOLUTION NO. 559-2010

AWARD OF CONTRACT FOR EMERGENCY RADIO COMMUNICATION SYSTEM CAPITAL PROJECT NO. 7 – 2006

WHEREAS, Resolution No. 496-2006 created Capital Project No. 7 of 2006, the New Ontario County Emergency Communication System, and hired the firm of L. Robert Kimball & Associates, Inc. (hereinafter referred to as ‘Kimball’) to provide engineering services in regard to the preliminary design of said communication system; and

WHEREAS, Kimball has worked with County staff to produce a plan for the Radio System in response to new Federal Communication Commission orders that require decommissioning of major portions of the County’s existing Emergency Communications System, and that maintain service levels for law enforcement and highway departments and provide that same level of service for Fire and EMS services; and

WHEREAS, Kimball has worked with County staff to draft Ontario County Request for Proposal R10032 entitled ‘Project 25 Countywide Digital Radio Network and (hereinafter referred to as the ‘RFP’) describing performance specifications and requirements for the core components of a new Ontario County Emergency Radio Communication System, a copy of which is on file with the Clerk of this Board; and

WHEREAS, Said RFP was released and advertised by the County Purchasing Department; and

WHEREAS, Two responses to said RFP were received by the County Purchasing Department, copies of which are on file with the Clerk of this Board; and

WHEREAS, The County Project Manager, representatives from Kimball, the Sheriff, the 9-1-1 Coordinator, the Emergency Management Coordinator, the County’s Chief Information Officer, and several other involved County staff, hereinafter collectively referred to as the ‘Project Management Team,’ evaluated said RFP responses according to the criteria and scoring described in said RFP, with the resulting scoring on file with the Clerk of this Board; and

WHEREAS, Both vendors submitting responses to said RFP were interviewed by the Project Management Team and both vendors offered additional enhancements to their proposals during their interviews as documented in the letters from said vendors, copies of which are on file with the Clerk of this Board; and

RESOLUTION NO. 559-2010

WHEREAS, Kimball and the Project Management Team have recommended that the proposal submitted by Harris Corporation, RF Communications Division as enhanced by their letter dated July 12, 2010 be accepted; and

WHEREAS, The Public Safety Committee has reviewed and recommends adoption of this resolution; now therefore, be it

RESOLVED, That the Ontario County Board of Supervisors hereby accepts the proposal of Harris Corporation, RF Communications Division , 1680 University Avenue, Rochester, NY 14610, as described in their response to RFP R10032 dated June 4, 2010, as clarified by the vendors "Orals Presentation" binder dated July 12, 2010, and as enhanced as documented in the vendor's letter dated July 12, 2010, and as further clarified based on the vendor's letter dated July 27, 2010, all on file with the Clerk of this Board to provide a P25 Countywide Digital Radio Network for an amount not to exceed Nine Million One Hundred and Ninety Nine Thousand Dollars (\$9,199,000.00); and further

RESOLVED, That the Ontario County Board of Supervisors hereby accepts the option pricing provided by Harris Corporation, RF Communications Division for a Verint Logging Recorder for an additional Ninety Five Thousand Two Hundred Forty Three Dollars and Fifty Five Cents (\$95,243.55) as described in their cost proposal dated July 12, 2010, bringing the contract total to Nine Million Two Hundred Ninety Four Thousand Two Hundred Forty Three Thousand Dollars and Fifty Five Cents (\$9,294,243.55); and further

RESOLVED, That the County Administrator be, and hereby is, authorized and empowered to execute a contract with said firm for said amount, subject to review and approval by the Office of the County Attorney; and further

RESOLVED, That the term of said contract shall commence on September 17, 2010, and terminate on December 31, 2013; and further

RESOLVED, That the cost of this contract shall be funded from line item E2550 Signal and Equipment in the budget of Capital Project No. 7 of 2006; and further

RESOLVED, That the Department of Finance is directed to make all necessary budgetary and accounting entries to effect the intent of this resolution; and further

RESOLVED, That certified copies of this resolution be sent by the Clerk of this Board to the Finance Department and to Mr. Michael Maurer of Harris Corporation, RF Communications Division.

STATE OF NEW YORK }
COUNTY OF ONTARIO }



I do hereby certify that I have compared the preceding with the original thereof, on file in the Office of the Clerk of the Board of Supervisors at Canandaigua, New York, and that the same is a correct transcript therefrom and of the whole of said original; and that said original was duly adopted at a meeting of the Board of Supervisors of Ontario County held at Canandaigua, New York, on the 16th day of September, 2010.

Given under my hand and official seal September 17, 2010.

Karen R. DeMay

Clerk, Board of Supervisors of Ontario County, NY

APPENDIX C

PROJECT IMPLEMENTATION SCHEDULE

ONTARIO COUNTY Project 25 700 MHz Updated Implementation Plan

