



Terry Martin

Hart County Judge Executive

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Franklin Turner
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Fifth District Magistrate

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Hart County Treasurer

Cherryl Brewer
Hart County Fiscal Court Clerk

Paula S. Day
Hart County Finance Officer

June 20, 2012

To: Federal Communications Commission

From: Hart County Fiscal Court

Subject: Waiver Request for Extension of Narrowband Deadline
Requested Waiver date-March 1st, 2013
(2 month extension)

Ref: FCC Licenses KMK424, WNMT203
FCC Section 1.925 waiver standards

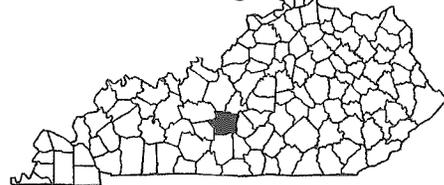
To whom it may concern,

As with most small County Governments, budgets for communications and many other required services are stretched beyond available funds. State and Federal assistance through Grants from various agencies has been a godsend to Public Safety communications systems. Unexpected delays in implementation plans have necessitated a request for a short extension as explained below.

Hart County has been aware of the narrowband requirement and the deadline. Steps have been taken toward meeting this deadline as well as many other required changes involved in Public Safety Communications not related to narrowband. In the aggregate, expenses have been great and the implementation process slowed by available funding and planning delays. The following recaps our plan, funding, delays and resolution to complete narrowband compliance and still improve Public Safety communications.

Radio Systems Involved

The systems involved in these two licenses are single VHF repeaters for County Fire and Law Enforcement use throughout the County.



Hart County is an Equal Opportunity Employer

Original Hart County Narrowbanding Plan

- Modifications of all County FCC licenses to include Narrowband emissions.. This was completed in 2009.
- Identification of equipment incapable of Narrowband operation. Also completed.
- Replacement of that equipment. This is our current position.
- Reprogram all County agencies to meet the required deadline of January 1st, 2013.

The following steps have been taken to locate funding

*Grant sources have included the State of Kentucky and Federal agencies. Previous Grant applications have been denied. We have now applied for a Homeland Security Grant, but results will not be out until late December, 2012. This is the PRIMARY reason we are requesting this extension! We believe this application will be approved, but it leaves NO time to implement the last step of our narrowbanding plan. Including equipment ordering, installation and reprogramming, we should be able to complete the Narrowband process County wide by **March 1st, 2013** at the VERY LATEST. It will be sooner if equipment can be built and shipped earlier.

*As an alternative our planning has included entering into agreements with the Kentucky State Police to close our County funded 911 Dispatch Center and move Dispatch operations out of the County to the State Police Post in Bowling Green, KY. This was done as a cost savings move to budget previous Dispatch funds into narrowbanding and other needed departmental needs. That process took longer than expected and budgeted funds were simply not available as quickly as originally thought possible for narrowbanding. Grant applications were being made at the same time with no success.

Additional Upgrades and Improvements

*In discussions with users in all County departments, it was determined that improvements in radio coverage would be necessary for system performance and safety of our personnel. Bids were taken and awards made to raise the tower height and antennas at our primary radio site. Funds for this project were provided by a separate department and not by the County. That project is currently acquiring the proper FAA and FCC approvals prior to beginning work at the tower site.

*Other than raising our tower height, the upgrade to narrowband does not include any infrastructure upgrades

System Affect and Impact on Neighboring Systems and C0-channel users

- There is no impact on neighboring radio system users as relates to interoperability or dependences.
- Being rural, there are no co-channel or adjacent channel issues expected.
- Due to our location, we enjoy relative interference free use of our radio systems. Changing bands would also be totally out of the financial ranges available as well. Therefore, we have no plans to migrate to any other operating band.

Implementation of Final Conversion to Narrowband

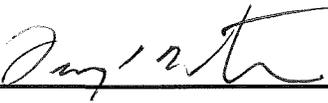
*Upton receipt of the Grant approval, equipment will be ordered to replace non-compliant equipment Grant approval OR denial is expected by December, 2012.

*In the event the current Grant application is denied, the County will enter into the best loan agreement that can be found to purchase this equipment as quickly as possible.

* Purchase Orders will be issued as soon afterward as possible and equipment ordered on an expedited basis.

* Repeaters will be installed as soon as they arrive from the manufacturer and reprogramming scheduled for all County departments. This should be within a week of repeater equipment arrival. This will complete the project.

Signed this 25th Day of June, 2012



Terry Martin , Hart County Judge/Executive