

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
POLK COUNTY SHERIFF'S OFFICE)
SAYLOR TOWNSHIP, IOWA)
JOHNSTON FIRE DEPARTMENT)
CITY OF ANKENY, IOWA)
CITY OF PLEASANT HILL, IOWA)
CITY OF GRIMES, IOWA)
CITY OF MITCHELLVILLE, IOWA)
)
)
Request For Extension Of Mandatory)
Narrowbanding Deadline)
)
Implementation of Sections 309(j) and 337 of the)
Communications Act of 1934 as Amended)

FILED/ACCEPTED

SEP 26 2017

Federal Communications Commission
Office of the Secretary

WT Docket No. 99-87

To: The Commission

PETITIONERS' REQUEST FOR EXTENSION

The Polk County, Iowa Sheriff's Office, Saylor Township, Iowa, the Johnston Fire Department, and the Cities of Ankeny, Pleasant Hill, Grimes, Mitchellville, Iowa, (collectively, "Petitioners")¹ through counsel and pursuant to Section 1.925 of the Commission's Rules, 47 C.F.R. §1.925, and the Commission's Public Notice of July 13, 2011,² hereby submit their request for a limited extension of the Commission's January 1, 2013 deadline for all VHF and UHF Part 90 operations to migrate to narrowband (maximum 12.5 kHz bandwidth or equivalent efficiency).³ In support thereof, the following is shown:

¹ A copy of this document is being served on adjacent channel licensees, in order that they might be informed as to the Petitioners' narrowbanding plans. Adjacent channel licensees seeking any additional information should contact Gregory Oshel of Shulman Rogers at goshel@shulmanrogers.com.

² Wireless Telecommunications Bureau, Public Safety and Homeland Security Bureau, And Office of Engineering and Technology Provide Reminder of January 1, 2013 Deadline for Transition to Narrowband Operations in the 150-174 MHz and 421-512 MHz Bands and Guidance for Submission of Requests for Waiver and Other Matters, *Public Notice*, DA 11-1189, released July 13, 2011 ("*Narrowbanding Extension Public Notice*").

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I. BACKGROUND

The Polk County Sheriff's Office dispatches 30 public safety agencies within the county (including city police and fire departments, the county medical examiner, the Iowa National Guard, and the Army Corps of Engineers). Polk County is the most populous county in Iowa and contains the state capital, Des Moines. The 30 separate law enforcement and fire agencies the Sheriff's Office dispatches use three different systems: 800 MHz EDACS, VHF analog conventional, and UHF analog. Exhibit 1, attached hereto, lists Petitioners' land mobile stations licensed pursuant to Part 90 of the Commission's Rules and impacted by the Commission's narrowbanding rules.

In April 2012, the 30 agencies decided to consolidate on the same 800 MHz trunking platform currently used by the Polk County Sheriff's Office, which is upgradeable to P25 within 12 months after system installation is complete. A contract for the new system was awarded to RACOM Corporation in April 2012 and the system is currently being installed. The new system will replace the three disparate systems in Polk County, providing seamless interoperability, improved coverage, and narrowband compliance.

The installation of the new system has been delayed due to the lengthy tower site acquisition process, putting the project completion date past January 1, 2013. System cutover is expected in June 2013, with final acceptance in August 2013. On this basis Petitioner requests a waiver of the Commission's Rules to permit additional time for Petitioner to complete their narrowbanding effort.

II. PETITIONERS' EXTENSION REQUEST

The Commission's *Narrowbanding Extension Public Notice* contains a list of questions which the Commission requests that applicants seeking extension provide information on in their extension requests. The following represents Petitioners' responses to those questions and issues.

A. Steps Already Taken To Complete The Narrowband Transition

18 FCC Rcd 3034 (2003)(*Second R&O*); Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Third Memorandum Opinion and Order, Third Further Notice of Proposed Rule Making and Order*, WT Docket No. 99-87, RM-9332, 19 RCC Rcd 2-545 (2004)(*Third MO&O*); Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Order*, WT Docket No. 99-87, RM-9332, 25 FCC Rcd 8861 (2010)(*Narrowbanding Waiver Order*); see also 47 C.F.R. §§90.203(j), 90.209(b).

As described above, Petitioners have taken a major effort to upgrade their land mobile radio systems and comply with narrowbanding requirements. More specifically, the Petitioners hired a consultant, issued a Request for Proposals, selected a vendor, awarded a contract, completed a detailed design review, and developed an implementation schedule. Tower and site construction are underway, but the lengthy site and tower acquisition process has put the anticipated completion date beyond December 2012. In addition, construction delays are possible due to the harsh Iowa winter.

B. System Size And Complexity

As described above, the Polk County Sheriff's Office currently dispatches for 30 agencies on three separate systems which are not interoperable. The various agencies have approximately 26 channels. In contrast, the replacement system will have 16 (10 licensed on WPTG316 and 6 NPSPAC frequencies applied for and currently in coordination) trunked channels.

The Polk County Sheriff's Office has a large radio system, adding to the complexity of moving to the new system. The Sheriff operates 350 mobiles, 635 portable radios, and 25 control stations. To replace the UHF and VHF systems used by public safety agencies it dispatches for, the Sherriff's Office has ordered 147 mobile radios, 384 portable radios, and 20 control stations.

C. Whether System Equipment Must Be Replaced Or Upgraded

Some of Petitioners' equipment is incapable of narrowband operation; they intend to replace the equipment with new radios compatible with the new system.

D. Planned System Upgrades During Narrowbanding

As described above, Petitioners are creating a new joint communications system that will comply with narrowbanding requirements.

E. Funding Sources, Government Approval, Multi-Year Budgeting

The Petitioners received budgetary approval for their new system in April 2012.

F. Narrowbanding Scheduling Dependency On Neighboring Licensees

The Polk County Sheriff's Office dispatches for the majority of agencies within Polk County but is currently doing so on multiple and disparate radio systems and frequency bands. The goal of this project is to unite all agencies on a single P25 radio system.

G. Plans To Minimize Impact On Co-Channel And Adjacent Channel Licensees

Petitioners hope to minimize to the greatest extent possible interference to adjacent and co-channel licensees. To do so, Petitioners will use wideband for the shortest amount of time possible, which is expected to be less than one year.

In addition, Exhibit 2, attached hereto, represents a list of adjacent channel licensees within proximity of Petitioners operations. The Petitioners are providing a copy of this Waiver Request to each impacted licensee. In this manner, each licensee will be alerted to Petitioner's continued wideband operation, the schedule for narrowbanding the relevant station, and contact information should there be an interference problem. Petitioners pledge to work with each impacted licensee to minimize interference. Should any adjacent channel licensee have a question about this request, they may contact Gregory Oshel of Shulman Rogers at goshel@shulmanrogers.com.

H. Licensee Plans To Migrate To Non-VHF/UHF Band Systems

Once the Petitioners have migrated out of the VHF/UHF bands, they will relinquish much of their unused VHF/UHF spectrum. Petitioners have identified 21 frequencies that will be relinquished when the project is complete.

III. CONCLUSION

Petitioners' new land mobile radio system is currently under construction and will likely be partially operational before January 1, 2013. However, the new system may not be completely tested and accepted by that date. Installation of the new radios in vehicles is expected to be underway but incomplete at that time. Radio replacement and infrastructure replacement are expected to be complete by mid-2013.

A grant of an extension of time to complete narrowbanding for Petitioners would not frustrate the Commission's Rules as the Petitioners expect to complete system cutover in mid-2013 and will decommission their old VHF/UHF systems as soon as the new system is operational. Petitioners face unique difficulties, as they are not only transitioning to narrowband but also replacing numerous agencies' systems with one 800 MHz trunking platform. Furthermore, the Petitioners are well on their way toward completing the narrowband transition. For these reasons, failure to extend the narrowbanding deadline for the impacted stations would be contrary to the public interest and would not serve any public purpose. There is no reasonable

alternative for narrowbanding such stations, as the effort has been underway for some time, is continuing, and requires a significant amount of personnel.

WHEREFORE, Petitioners respectfully request that the FCC act expeditiously to grant Petitioners a waiver of the Commission's Rules, and extend the narrowbanding deadline for Petitioners' impacted stations by one year.

Respectfully submitted,

**POLK COUNTY SHERIFF'S OFFICE
SAYLOR TOWNSHIP, IOWA
JOHNSTON FIRE DEPARTMENT
CITY OF ANKENY, IOWA
CITY OF PLEASANT HILL, IOWA
CITY OF GRIMES, IOWA
CITY OF MITCHELLVILLE, IOWA**



By: Alan S. Tilles, Esquire
Its Attorney

Shulman Rogers Gandal Porfy & Ecker,
P.A.

12505 Park Potomac Ave., Sixth Floor
Potomac, Maryland 20854

(301) 231-0930

Date: September 26, 2012

Exhibit 1

Callsign	Licensee
KAB540	Polk County
WNJL952	Polk County
KDS685	Ankeny, City of
KDS686	Ankeny, City of
KSV744	Ankeny, City of
WPQG563	Ankeny, City of
KEL530	Pleasant Hill
KNDE688	Grimes
WNBZ900	Saylor Township
WQDZ998	Mitchellville
WQEG507	Johnston Fire Department

Exhibit 2

Licensee	Licensee Street Address	Licensee City, State, ZIP Code
ADAIR, CITY OF	707 GUTHRIE ST	ADAIR, IA 50002
ADAIR, COUNTY OF	306 E. IOWA STREET	GREENFIELD, IA 50849
ALTOONA, CITY OF	407 8TH ST SE PO Box 338	ALTOONA, IA 50009-0338
BAXTER, CITY OF	203 SOUTH MAIN	BAXTER, IA 50028
B-K Electric, Inc.	501 N. Federal Street	Griggsville, IL 62340
BREMER, COUNTY OF	111 4th St NE	WAVERLY, IA 50677
BUSSEY, TOWN OF	104 DEWEY ST Box 219	BUSSEY, IA 50044
Cedar Rapids, City of	505 1st St SW ATTN: Charlie McClintock	CEDAR RAPIDS, IA 52404
CENTERVILLE, CITY OF	312 E Maple ATTN: Street Dept.	Centerville, IA 52544
CLARKE, COUNTY OF	220 TOWNLINE RD	OSCEOLA, IA 50213
CONRAD, CITY OF	204 E Center St PO Box 429	CONRAD, IA 50621
CRAWFORD, COUNTY OF	38 N. MAIN ST	DENISON, IA 51442
DALLAS, COUNTY OF	201 N 8TH ST PO Box 187	ADEL, IA 50003-0187
DES MOINES, CITY OF	400 ROBERT D RAY DRIVE	DES MOINES, IA 50309
DUBUQUE, CITY OF	11000 AIRPORT RD	DUBUQUE, IA 52003
Electronic Specialties, Inc.	2103 Highway 169 North PO Box 248	ALGONA, IA 50511
GREENFIELD, CITY OF	202 S 1ST ST	GREENFIELD, IA 50849
GRIMES, CITY OF	101 N HARVEY	GRIMES, IA 50111
HARDIN, COUNTY OF	1116 14th Ave ATTN: Sheriff Smith	ELDORA, IA 50627
INDIANOLA, CITY OF	PO Box 338110	INDIANOLA, IA 50125
IOWA, COUNTY OF	729 CHERRY AVENUE PO Box 191	MARENGO, IA 52301
IOWA, STATE OF	5912 SECOND AVE	DES MOINES, IA 50313
IOWA, STATE OF	502 East 9th Street	Des Moines, IA 50319
JACKSON, COUNTY OF	102 S NIAGARA	MAQUOKETA, IA 52060
JASPER, COUNTY OF	2300 LAW CENTER DR.	NEWTON, IA 50208
Jewell, City of	838 Main St PO Box 486	Jewell, IA 50130
JOHNSTON FIRE DEPARTMENT	6015 NW 62ND AVE PO Box 410	JOHNSTON, IA 50131
LADORA, CITY OF	PO Box 169	LADORA, IA 52251-0169
LINN, COUNTY OF	310 2nd Ave SW PO Box 669 ATTN: Capt. Knott	Cedar Rapids, IA 52406
LUCAS, COUNTY OF	48559 Hy-Vee Road	CHARITON, IA 50049
MADISON, COUNTY OF	1012 N. JOHN WAYNE DR	WINTERSET, IA 50273
MADRID, CITY OF	304 S. WATER STREET	MADRID, IA 50156
MARION, COUNTY OF	114 S. 3RD ST.	KNOXVILLE, IA 50138
MARSHALLTOWN, CITY OF	22 N. Center St.	MARSHALLTOWN, IA 50158

MITCHELLVILLE, CITY OF
MUSCATINE, CITY OF
NEW SHARON, CITY OF
NEWARK COLFAX FIRE DISTRICT
NEWTON, CITY OF
NORWALK, CITY OF
PELLA, CITY OF
PERRY, CITY OF
PLEASANT HILL, CITY OF
PLEASANTVILLE, CITY OF
POTTAWATTAMIE, COUNTY OF
R Comm LLC
RADIO COMMUNICATIONS CO INC
SAC, COUNTY OF
SAYLOR, TOWNSHIP OF
SHELDON, CITY OF
SIOUX, COUNTY OF
STORY, COUNTY OF
WARREN, COUNTY OF
WASHINGTON COUNTY MINI BUS
Waterloo, City of
WAUKEE, CITY OF
WEST DES MOINES, CITY OF
WEST LIBERTY, CITY OF
WOODWARD COMMUNITY FIRE DEPT
WORTH, COUNTY OF

110 2ND STREET NE
312 E 5th ST
201 E MARKET PO Box 507
PO Box 234
410 S 2ND AVE W
1100 CHATHAM AVENUE
614 MAIN
908 WILLIS AVE
5151 MAPLE DR
PO Box 566
227 S 6th St ATTN PCSO Communications
2010 Washington Ave.
2131 N TOWNE LN NE
100 N W State St
211 NW 54TH AVE
416 9TH ST
4363 IRONWOOD AVENUE, SUITE 1
900 6TH ST
115 N HOWARD STREET PO Box 337
1010 W 5TH ST
715 Mulberry St. ATTN: Capt. Beckman
1300 L.A. GRANT PWKY
4200 Mills Civic Parkway P.O. Box 65320
409 N CALHOUN ST
301 S MAIN ST PO Box 142
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PLEASANTVILLE, IA 50225
COUNCIL BLUFFS, IA 51501
Iowa Falls, IA 50126
CEDAR RAPIDS, IA 52402
SAC CITY, IA 50583
DES MOINES, IA 50313
SHELDON, IA 51201
ORANGE CITY, IA 51041
NEVADA, IA 50201
INDIANOLA, IA 50125
WASHINGTON, IA 52353-2358
WATERLOO, IA 50703
WAUKEE, IA 50263
WEST DES MOINES, IA 50265-0320
WEST LIBERTY, IA 52776-1344
WOODWARD, IA 50276
NORTHWOOD, IA 50459

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MARSHALLTOWN, CITY OF	22 N. Center St.	MARSHALLTOWN, IA 50158

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NEW SHARON, CITY OF
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WARREN, COUNTY OF
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WEST DES MOINES, CITY OF
WEST LIBERTY, CITY OF
WOODWARD COMMUNITY FIRE DEPT
WORTH, COUNTY OF

110 2ND STREET NE
312 E 5th ST
201 E MARKET PO Box 507
PO Box 234
410 S 2ND AVE W
1100 CHATHAM AVENUE
614 MAIN
908 WILLIS AVE
5151 MAPLE DR
PO Box 566
227 S 6th St ATTN PCSO Communications
2010 Washington Ave.
2131 N TOWNE LN NE
100 N W State St
211 NW 54TH AVE
416 9TH ST
4363 IRONWOOD AVENUE, SUITE 1
900 6TH ST
115 N HOWARD STREET PO Box 337
1010 W 5TH ST
715 Mulberry St. ATTN: Capt. Beckman
1300 L.A. GRANT PWKY
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409 N CALHOUN ST
301 S MAIN ST PO Box 142
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COUNCIL BLUFFS, IA 51501
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CEDAR RAPIDS, IA 52402
SAC CITY, IA 50583
DES MOINES, IA 50313
SHELDON, IA 51201
ORANGE CITY, IA 51041
NEVADA, IA 50201
INDIANOLA, IA 50125
WASHINGTON, IA 52353-2358
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