

Decatur-Grady E-911

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

RE: Decatur County, Georgia
Grady County, Georgia
Request for Waiver

Enclosed please find a Request for Waiver of the narrowbanding deadline of January 1, 2013. We are requesting an extension of the deadline until April 30, 2013.

Decatur County, Georgia and Grady County, GA requests said waiver on behalf of all of the Public Safety agencies and Government entities within Decatur County, Georgia and Grady County, GA, which includes the following Licensees:

Decatur County Sheriff's Office
Decatur County Fire & Rescue
Decatur County Emergency Medical Services
Decatur County Corrections/Public Works
City of Bainbridge Public Safety
City of Bainbridge Public Works
Decatur County Board of Education

Grady County Sheriff's Office
Grady County Volunteer Fire Department
Grady County Emergency Medical Services
Grady County Public Works
City of Cairo Police Department
City of Cairo Fire Department

Thank you in advance for your consideration.

Respectfully submitted,

A handwritten signature in black ink that reads "Tonya Griffin".

Tonya Griffin
Decatur-Grady E-911
Communications Director

REQUEST FOR WAIVER OF THE NARROWBANDING DEADLINE

In accordance with the guidelines issued in the Public Notice, DA-11-1189, Decatur County, GA, the City of Bainbridge, GA, the Decatur County Board of Education, Grady County, GA, and the City of Cairo, GA requests a waiver of the mandate to convert its VHF Public Safety radio channels to narrow band operation by January 1, 2013.

History:

On April 6, 1993, Decatur County, GA and Grady County, GA signed an agreement to provide emergency 911 services and consolidated dispatch for law enforcement, fire, emergency medical, and emergency management services for a 1052 square mile area of Southwest Georgia, with a total population of 52,949.

We operate a consolidated, multi-jurisdictional dispatch center and utilize a VHF analog voice radio system. The system is comprised of one fixed transmitter site for each county connected to the dispatch center by microwave link, mobile units, portable units, and voice pagers. The current radio system includes single VHF transmitters and repeaters for the following agencies callsigns:

Agency:	CallSign:	Agency:	CallSign:
Grady Co Sheriff	KNNI568	Decatur Co Sheriff	KUE588
Grady Co Public Works	KNNN555	Decatur Co Fire & Rescue	WQCZ782
Grady Co EMS	WPHH723	Decatur Co EMS	WPSJ324
Grady Volunteer Fire	WPSI377	Decatur Co Corrections/Public Works	WPSJ539
City of Cairo Fire	WNUB250	Bainbridge Public Safety	KIB566
City of Cairo Police	WQAW306	Bainbridge Public Works	KNEA338
Decatur Co Board of Education	WQJV677	Decatur Co Board of Education	WPLZ345

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

In June 2009, the counties explored the possibility of creating a regional 800 MHz radio system that included other surrounding counties. A grant was submitted to the Georgia Emergency Management Area 2 All Hazards Council for possible funding, but was not approved for funding.

On August 9, 2010, the next step of this process began when Decatur and Grady Counties signed a contract with RCC Consultants Inc, of Tallahassee, FL to review all of the current equipment and provide a Request for Proposal (RFP) for upgrading to a new radio system which included narrowbanding. During Phase I of this project, RCC Consultants identified current equipment that is incapable of Narrowbanding operations. It was determined that

the majority of the current equipment is incapable of narrowbanding, and would need replacing. An RFP was issued on January 6, 2012

On June 12, 2012, a contract was executed with Motorola to install a 2 site per county, P25 Digital Simulcast System. Motorola began work immediately on the project in order to meet the FCC narrowbanding deadline of January 1, 2013. Milestones of the project already completed:

- On June 27, 2012 a Contract Design Review was held with Motorola to review proposed system and equipment.
- Architectural and Engineering
 - On August 1, 2012, A&E firm subcontracted for site walks and began collecting data for construction drawings on new shelters, and requested tower construction drawings.
 - Structural analyses were received on three (3) towers by October 9, 2012 and remedial engineering began.
- 911 Center Renovations
 - 911 Center Renovations were completed on September 7, 2012 to allow space for the new equipment.
- Fixed Network Equipment (FNE)
 - Order for FNE was placed with Motorola on August 1, 2012.
 - FNE for each site was delivered by First Communications to the site on October 30, 2012.
 - FNE installation is scheduled to be completed by December 7, 2012.
- Frequency Planning
 - All licenses that will be used on the system have been submitted for frequency coordination or already filed with FCC.
 - Prior Coordination Notices have been submitted, and application for microwaves was submitted to FCC on November 5, 2012.
- Subscriber Equipment
 - All subscriber equipment has been shipped and is warehoused in each jurisdiction. First Communications has begun programming and distributing radios to each agency for testing and validating code plugs.
- Site Development
 - Shelters and generators have been set for each site. Electrical work and grounding began on October 8, 2012 and is expected to be completed on November 30, 2012.

- **Hwy 97 site** – Remediation has been completed on this tower. Filing and registration paperwork was completed on October 23, 2012 to register the tower and amend the overall height of the tower to 225' to accommodate the new receive antenna.
- **State Park Rd site (Primary Site Grady Co)** – Grady County has contracted with a tower company to provide remediation work on the tower; however, some materials needed from Rohn to complete remedial work on the tower have a 3-4 week lead time before shipping. Completion of remediation is expected to be completed by December 19, 2012.
- **Reno site** – The tower owner has contracted with a tower company to provide remediation work on the tower. Remediation began on November 1, 2012 is expected to be completed by November 30, 2012.
- **Spring Creek Rd site (Primary site Decatur Co)** – Structural analysis will be completed by November 8, 2012. Electrical and grounding work has been completed on this site. It is expected that remediation will be needed on this tower similar to the State Park Rd tower; if this is the case, some materials from Rohn that will be needed for remediation work will have the same 3-4 week lead time.

System size and complexity:

- The new system will have 2 additional simulcast sites, connected to the primary sites for each county by microwave link, to provide for additional coverage.
- One simplex VHF channel will be used for each county to provide paging capabilities for public safety.
- New subscriber mobiles and portables are being programmed to work on both the old system and new system. This will alleviate units from having to carry 2 portables or having 2 mobiles installed in vehicles. Programming and installations are currently underway.
- Due to the age of the towers, remediation is required to meet current standards for proposed loading, impeding the installation of microwave and RF antennas. All fixed network infrastructure equipment except antenna and microwaves will be installed prior to January 1, 2013.

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

Virtually all the current system infrastructure required replacement to be narrowband compliant. The new infrastructure will be installed, but will not be able to go on air until tower remediation and microwave and antennas installation is completed.

The majority of subscriber equipment (mobiles, portables, pagers) required replacement to be narrowband compliant. New subscriber mobiles, portables and pagers are narrowband capable, and are being programmed so the equipment can be used on the old system and new system. All units will be using new mobiles, portables and pagers prior to January 1, 2013 deadline.

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

The existing system would not have provided adequate radio coverage had it simply been converted to narrowband operation by replacing the infrastructure equipment.

The new system will provide significant improvement in radio coverage for mobiles and portables for all responders of Decatur and Grady Counties by adding one (1) simulcast site in each county.

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

Funding has been approved by each jurisdiction’s governmental body involved in the process. Each jurisdiction has provided their own funding source, whether it is out of general fund or low interest loan. Payments have already been made according to the billing milestones below.

The project costs are broken down by each jurisdiction, and are billed according to the following project milestones:

Decatur/Grady GA-121100A Billing Milestones				
Percentage	BM #	Description	Amount	Date
30%	1	Contract Execution	\$1,071,418.03	6/12/12
50%	2	Shipment of FNE Equipment	\$1,785,696.72	10/25/12
10%	3	Completion of FNE Installation	\$357,139.34	
10%	4	System Acceptance	\$357,139.34	
100%		Contract Price	\$3,571,393.44	

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

Currently all licenses for Decatur and Grady Counties are either in coordination or pending status with the FCC. All equipment for the new system has been ordered, or delivered to the site locations. While the counties are proceeding with the necessary site construction and tower remediation, it is unclear at this time if the remediation work will be completed before

the January 1, 2013 deadline due to lead time on materials that is needed to complete the work.

All infrastructure and subscriber equipment will be installed by December 31, 2012. As soon as the tower remediation is completed and licensing is received from the FCC, equipment will already be in place to begin tuning and optimization of the new radio system.

Decatur and Grady Counties narrowbanding schedule is therefore dependent upon the progress of the tower remediation work on the primary site in each county. Also, the counties schedule does not affect neighboring systems.

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:

Grady County is bordered by Thomas County, GA to the east, and Leon County, FL to the south, which operates on the 800 MHz frequency band. The western border of Grady County is bordered by Decatur County and the frequencies will not interfere. To the North, Mitchell County operates on a VHF frequency but no interference is expected.

Decatur County's northern border, western border and southern border are Miller County, GA, Seminole County, GA, and Gadsden County, FL respectively. Each bordering county operates on a VHF frequency and our continued operations in the wide band mode will not have any negative impact on the existing licensees.

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 one it has migrated and the amount of spectrum to be relinquished:

The new system will utilize VHF band so this does not apply.

Proposed timetable for completion of narrowbanding:

- **The following are steps that Decatur and Grady Counties have taken to date towards completion of the narrowbanding process:**
 1. Shelters and generators have been set for each site. Electrical and grounding will be completed for each site by November 30, 2012.

2. Fixed network equipment (FNE) has been delivered to each site and will be installed by December 7, 2012.

3. Tower remediation:
 - **Hwy 97 site** – Remediation has been completed on this tower. Filing and registration paperwork was completed on October 23, 2012 to register the tower and amend the overall height of the tower to 225’ to accommodate the new receive antenna.
 - **State Park Rd site (Primary Site Grady Co)** – Grady County has contracted with a tower company to provide remediation work on the tower; however, some materials needed from Rohn to complete remedial work on the tower have a 3-4 week lead time before shipping. Completion of remediation is expected to be completed by December 19, 2012.
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4. Subscriber mobiles, portables and pagers are currently being programmed and installed for each agency. Installation and delivery of portables to each agency is expected to be completed by December 31, 2012.

5. FCC licensing for each agency is in progress. Licensees are either in coordination or have been submitted to FCC for approval.

As of November 13, 2012:

Agency:	CallSign:	Status:
Grady Co Sheriff	KNNI568	Coordination in progress: APCO
Grady Co Public Works	KNNN555	Coordination in progress: EWA
Grady Co EMS	WPHH723	Coordination in progress: APCO
Grady Volunteer Fire	WPSI377	FCC File #0005446858
City of Cairo Fire	WNUB250	Coordination in progress: IMSA
City of Cairo Police	WQAW306	Coordination in progress: APCO
Decatur Co Fire & Rescue	WQCZ782	Coordination in progress: IMSA
Decatur Co Sheriff	KUE588	Coordination in progress: APCO
Decatur Co EMS	WPSJ324	Coordination in progress: APCO
Decatur Co Corrections/Public Works	WPSJ539	Coordination in progress: APCO

Bainbridge Public Safety	KIB566	Coordination in progress: APCO
Bainbridge Public Works	KNEA338	Modification filed
Decatur Co Board of Education	WPLZ345	FCC File #0005406385
Decatur Co Board of Education	WQJV677	FCC File #0005415000
Microwave Links		ComSearch in progress
Paging Frequencies		Coordination in progress

Anticipated dates of commencement and completion of:

▪ **Replacement or retuning of mobiles/portables:**

Subscriber mobiles, portables and pagers are currently being programmed and installed for each agency. Installation and delivery of portables to each agency is expected to be completed by December 31, 2012.

▪ **Infrastructure replacement or retuning:**

Initial test cut-over date is planned for April 12, 2013, with final cut-over no later than April 30, 2013.

Impediments to completion of the new system by the narrowbanding deadline are as follows:

1. FCC License Coordination and Approval, prevents us from ordering the combiners which is normally an 8-week lead-time.
2. Tower Remediation - Current schedule indicates the last tower (Spring Creek Rd – Primary Site) will be completed on or about January 30, 2013, due to the uncertainty of the remedial engineering requirements needed on the tower to meet current standards before installation of RF antennas and microwaves.
3. Hwy 97 FAA/FCC Re-Filing; obtaining approval for the amended height of 225' for the new RF antenna.

The following timeline for implementation of the new system has been provided by our vendor:

ID	Task Name	Duration	Start	Finish	Predecessors	Successors
1	Contract Reward	8 days	Fri 6/1/12	Tue 6/12/12		
2	CDR	3 days	Wed 6/27/12	Fri 6/29/12	1FS+10 days	2FS+10 days
3	Manufacturing/Staging	74 days	Mon 7/2/12	Thu 10/11/12	2	4FS+20 days, 3
4	All Sites A&E includes NEPA	78 days	Mon 8/6/12	Wed 11/21/12	2FS+20 days	7
5	All Sites Install Buildings	30 days	Mon 10/8/12	Fri 11/16/12	4SS+45 days	days, 9, 6FS+25 days
6	Microwave & RF Antenna and lines	25 days	Thu 12/27/12	Wed 1/30/13	4FS+25 days	7
7	Install FNE Equipment	15 days	Mon 11/19/12	Fri 12/7/12	3, 5	8, 10
8	Optimization	10 days	Thu 1/31/13	Wed 2/13/13	7, 6	8
9	Subscriber Programming	55 days	Thu 11/22/12	Wed 2/6/13	4	11
10	Training	20 days	Thu 1/31/13	Wed 2/27/13	6	11
11	ATP/Coverage Testing Complete	20 days	Thu 2/14/13	Wed 3/13/13	8, 9	12
12	Cutover	11 days	Thu 3/14/13	Thu 3/28/13	11, 10	12
13	Final Acceptance	30 days	Fri 3/29/13	Thu 5/9/13	12	13

Project: Preliminary 110512WJG
Date: Mon 11/5/12

Task Split Milestone

Summary Project Summary External Tasks

External Milestone Deadline Progress

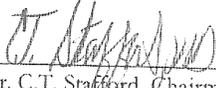
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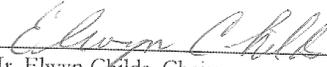
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Respectfully submitted this 14th day of November, 2012.



Dr. C.T. Stafford, Chairman
Decatur County Board of Commissioners



Mr. Elwyn Childs, Chairman
Grady County Board of Commissioners