



Virginia International Terminals, Inc.

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December 3, 2012

Office of the Secretary
Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Request for Waiver of FCC Narrowbanding Requirement
FCC WT Docket No. 99-87

Dear Madame Secretary:

Virginia International Terminals (VIT), Inc., pursuant to Section 1.925 of the Federal Communications Commission (FCC) rules and Public Notice, DA 11-11891 is hereby requesting a waiver of FCC Rule Section 90.209(b)(5). VIT requests a limited extension of twelve (12) months to the January 1, 2014, narrowbanding requirement that was established pursuant to WT Docket No. 99-873. In support of this waiver request, we are submitting the following information.

Licenses Requiring Limited Extension

WZA648 (20K0F3E)

¹Wireless 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 421-4512 MHz Bands and Guidance for Submission of Requests for Waiver and Other Matters, Public Notice, DA 1101189, released July 13, 2011.

²To January 1, 2014.

³See Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, Second Report and Order and Second Further Notice of Proposed Rulemaking, WT Docket No. 99-87, RM-9332, 18 FCC Red 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 Rulemaking and Order, WT Docket No. 99-87, RM-9332, 19 FCC Red 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-9332m 25 FCC Red 8861 (2010)(“Narrowbanding Waiver Order”).

Scope of VIT Wireless Operations (System Size and Complexity)

Virginia International Terminals, Inc. (VIT) is a marine terminal management company chartered by the Virginia Port Authority to operate the state-owned port terminal facilities. VIT serves seven terminal locations. VIT wireless communications is used by the operations staff to process containers on trucks entering and departing the facilities, dispatching mobile equipment in the field to move containers, and processing containers as they are taken off the vessels. Roughly 5,000 container transactions are processed daily using the wireless system.

Recent Initiatives

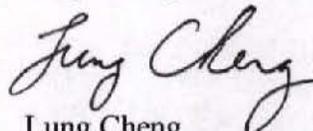
VIT is currently implementing a new terminal operating system that will eliminate the need for narrowband wireless devices.

Implementation Plan and Completion Dates

We currently have 370 narrowband devices in use. 125 of these devices are in our mobile units and 245 are handheld devices. We are actively changing both the mobile and handheld devices over to 802.11 devices. By July 2013, we will only have 40 narrowband devices remaining in production. By January 2014, all remaining narrowband devices will have been migrated to 802.11.

Given the plan to obsolete our current narrowband equipment, VIT respectfully requests that the FCC act expeditiously to grant this waiver of the Commission's Rules and extend the narrowbanding deadline for VIT by one year.

Respectfully,



Lung Cheng
Assistant Director
Information Technology

LC/jam