

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

In the Matter of)	
)	
Holmes County, Ohio)	
)	WT Docket No. 99-87
Request for Limited Extension of)	
Narrowbanding Deadline)	
)	
Implementation of Sections 309(j) and 337 of)	
the Communications Act of 1934, as Amended)	

To: Chief, Public Safety and Homeland Security Bureau

**REQUEST FOR WAIVER –
LIMITED EXTENSION OF REBANDING DEADLINE**

Holmes County, Ohio (“County” or “Petitioner”), by counsel and in accordance with Section 1.925(b)(3)¹ of the Federal Communications Commission (“FCC” or “Commission”) Rules and Regulations, respectfully requests an extension until June 29, 2013 of the requirement to narrowband the facilities and frequencies identified on Attachment A.² The County is in the process of modifying its facilities to comply with the requirement of FCC Rule Section 90.209(b) that its VHF and UHF stations utilize equipment with channel bandwidths no greater than 12.5 kHz.³ It has made substantial progress in this effort and has already replaced equipment for several frequencies with digital narrowband technology as indicated on its call signs KQA522 and WPYL643.⁴ However, additional work remains to be done before the project is completed.

¹ 47 C.F.R. § 1.925(b)(3).

² The license for call sign WNVH521 was issued in the name of Holmes Fire District 1, but the Fire District is an instrumentality of the County, not an independent taxing authority, as evidenced by the fact that the County and the Fire District share a single FRN.

³ 47 C.F.R. § 90.209(b).

⁴ The FCC will note that call sign WPSD981 previously was modified to add analog narrowband emission designators. That conversion did not and will not occur. The license will be modified again to reflect the correct narrowband digital emission designator.

In support of this waiver request, the following information is provided:

I. BACKGROUND

Holmes County is situated in Northeast-Central Ohio. The County has a total land area of almost 424,000 square miles, with the County seat in the Village of Millersburg. It has a resident population of over 42,000, including a very large Amish community that draws tourists from around the world, thereby increasing substantially the number of people located in the County at any given time.

Like many jurisdictions, the County has relied on legacy VHF facilities to meet the communications needs of its governmental users, including dispatching more than ten (10) public safety agencies and almost three hundred (300) subscriber units. The inventory conducted in response to the FCC's narrowbanding mandate revealed that over ninety percent (90%) of the radio equipment subject to that requirement was not capable of being narrowbanded and would need to be replaced, including all of the equipment used by the County's emergency responders – its police, fire and EMS personnel.

The County concluded that it would not serve the public interest to replace its aged equipment with narrowband analog radios. Instead, it has determined to upgrade its facilities to a digital system. The new system design will put all County agencies on a common technology platform. It also will enable them to replace a number of base stations that provided only limited coverage with a combination of County-owned and new, leased tower facilities, thereby reducing the number of fixed transmitter locations to three. The funding for this upgrade was made available through a FEMA Assistance to Firefighters Grant awarded in March 2012.

Despite their efforts to meet the January 1, 2013 narrowbanding deadline, the County experienced delays in finalizing the necessary tower leases and arranging to lease the exclusive

control channels needed to support its planned conversion to digital technology.⁵ In particular, finalization of the antenna structure registration (“ASR”) for one of these two towers was delayed for several months, due to the transition from the old to the new ASR procedures. That tower finally was approved in late November. Fortunately, work on the tower access road was completed in the interim, and the necessary steel has been delivered, as have the generator, shelter, and other materials that will enable this construction project to move forward quickly. The County now expects to complete this conversion to narrowband operations no later than June 29, 2013.

II. WAIVER SHOWING

The FCC has provided guidance to licensees that seek waiver relief from the narrowbanding requirement.⁶ Specifically, the Commission has asked for information in response to the following questions:

- 1) Steps already taken to plan for, initiate, and complete the transition to narrowband operations.

As described above, the County has completed its system inventory, awarded a contract to a vendor to provide narrowband equipment, tower leases, and exclusive control channels, and completed its digital system design. One tower is already available for the County’s use and the other will be constructed promptly now that the necessary FCC approval process has been completed. As noted above, the County already has secured FEMA funding to finance narrowband deployment.

- 2) System size and complexity.

The County’s system currently provides dispatching for more than ten (10) County agencies with approximately three hundred (300) subscriber units from multiple coverage-limited sites.

⁵ The County hopes to secure its own authorizations for exclusive FB8 channels, but its efforts to do so have not yet been successful.

⁶ See Wireless Telecommunication 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*, 26 FCC Rcd 9647 (2011) (“NB Waiver Guidance PN”); see also Wireless Telecommunications Bureau and Public Safety and Homeland Security Bureau Provide Supplemental Guidance for Licensees in the 150-174 MHz and 421-512 MHz Bands Seeking Waiver of the January 1, 2013 Narrowbanding Deadline, *Public Notice*, 27 FCC Rcd 1936 (2012).

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

Less than ten percent (10%) of the Petitioner's equipment was narrowband-capable. For all practical purposes, the entire system needed to be replaced.

- 4) Whether the licensee plans additional system upgrades or improvements in addition to converting to narrowband operation.

As described above, the County is migrating to a narrowband digital system, rather than replacing wideband analog with narrowband analog equipment. This upgrade will significantly improve communications within and between agencies in the County, as well as emergency response times.

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

While the County's budget does require governmental approval in a multi-year budget process, this narrowbanding project is being funded through a FEMA Assistance to Firefighters Grant awarded in March 2012.

- 6) Whether the licensee's narrowbanding schedule is affected by neighboring systems due to interoperability relationships or other interdependencies.

The County is not aware of any interoperability or interdependencies with other jurisdictions that will affect its narrowbanding schedule.

- 7) 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.

The County is approximately forty (40) miles from Canton, the nearest population center of significant size, and does not expect the limited extension requested herein to adversely affect any co-channel or adjacent channel licensees. However, if requested by the FCC, it will identify all such licensees with operations in proximity to the County's, will advise them of this waiver request, and will provide them with a single point of contact in the unlikely event that they experience any problems due to the County's continued wideband operation.

- 8) 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 expects to convert all VHF channels to digital narrowband capability. Once the narrowband migration is completed, it will modify its licenses to delete any base station locations that are no longer being used or that have been converted to control station locations.

III. CONCLUSION

The County submits that a six-month waiver of the narrowband deadline is warranted. It has been diligent in attempting to meet its narrowbanding obligations and will require only limited relief thereof, since the equipment on a number of its channels has been replaced already with narrowband equipment. The grant of this request would be consistent with the waiver standards set out in FCC Rule Section 1.925(b)(3).⁷ It would serve the public interest by enabling the County to implement a narrowband solution that also will significantly improve its communications capabilities and, thus, its ability to serve the public's emergency response needs without adversely affecting the operations of other users. Allowing this limited extension of the narrowbanding deadline would ensure that public grant funds are used most effectively to bring much needed improvements to the County's E-911 and other public safety dispatch operations.

Kindly refer any questions or correspondence regarding this matter to the undersigned.

Respectfully submitted,

Holmes County, Ohio



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December 6, 2012

⁷ 47 C.F.R. § 1.925(b)(3).

Holmes County

FRN	NAME	CALLSIGN	FREQUENCY	STA. CLASS	Emission Designator
0002914372	Holmes Fire District	WNVH521	000151.17500	MO	20K0F3E
0002914372	Holmes Fire District	WNVH521	000154.17500	FB2	20K0F3E
0002914372	Holmes Fire District	WNVH521	000154.17500	FB2	20K0F3E
0002914372	Holmes Fire District	WNVH521	000154.17500	MO	20K0F3E
0002914372	Holmes Fire District	WNVH521	000154.17500	FB2	20K0F3E
0002914372	Holmes Fire District	WNVH521	000154.17500	FB2	20K0F3E
0002914372	County of Holmes	WPZX883	000154.17500	FB2	20K0F3E
0002914372	Holmes Fire District	WNVH521	000154.32500	FB	20K0F3E
0002914372	Holmes Fire District	WNVH521	000154.32500	FB	20K0F3E
0002914372	Holmes Fire District	WNVH521	000154.32500	MO	20K0F3E
0002914372	County of Holmes	KQA522	000154.90500	FB2	20K0F3E
0002914372	County of Holmes	KQA522	000154.90500	FB2	20K0F3E
0002914372	County of Holmes	KQA522	000154.90500	MO	20K0F3E
0002914372	County of Holmes	KQA522	000154.90500	FB2	20K0F3E
0002914372	County of Holmes	WPZX883	000154.90500	FB2	20K0F3E
0002914372	County of Holmes	WPSD981	000155.16000	FB	11K0F3E
0002914372	County of Holmes	WPSD981	000155.16000	FB	20K0F3E
0002914372	County of Holmes	WPSD981	000155.16000	MO	11K0F3E
0002914372	County of Holmes	WPSD981	000155.16000	MO	20K0F3E
0002914372	County of Holmes	WPSD981	000155.17500	FB	11K0F3E
0002914372	County of Holmes	WPSD981	000155.17500	FB	20K0F3E
0002914372	County of Holmes	WPSD981	000155.17500	MO	11K0F3E
0002914372	County of Holmes	WPSD981	000155.17500	MO	20K0F3E
0002914372	County of Holmes	WPSD981	000155.23500	FB	11K0F3E
0002914372	County of Holmes	WPSD981	000155.23500	FB	20K0F3E
0002914372	County of Holmes	WPSD981	000155.23500	MO	11K0F3E
0002914372	County of Holmes	WPSD981	000155.23500	MO	20K0F3E
0002914372	County of Holmes	WPSD981	00155.28000	FB	11K0F3E
0002914372	County of Holmes	WPSD981	00155.28000	FB	20K0F3E
0002914372	County of Holmes	WPSD981	000155.28000	MO	11K0F3E
0002914372	County of Holmes	WPSD981	000155.28000	MO	20K0F3E
0002914372	County of Holmes	KQA522	000155.37000	FB	20K0F3E
0002914372	County of Holmes	KQA522	000155.37000	MO	20K0F3E
0002914372	County of Holmes	KOE280	000155.94000	FB	20K0F3E
0002914372	County of Holmes	KH3644	000155.94000	MO	20K0F3E
0002914372	County of Holmes	WPZX883	000155.94000	FB2	20K0F3E
0002914372	County of Holmes	KOE281	000158.83500	FB	20K0F3E
0002914372	County of Holmes	KQA522	000159.03000	MO	20K0F3E
0002914372	County of Holmes	WPGV414	000453.83750	MO	20K0F3E
0002914372	County of Holmes	WPGV414	000453.88750	MO	20K0F3E
0002914372	County of Holmes	WPGV414	000458.83750	MO	20K0F3E
0002914372	County of Holmes	WPGV414	000458.88750	MO	20K0F3E
0002914372	County of Holmes	WPGV414	000460.37500	MO	20K0F3E
0002914372	County of Holmes	WPGV414	000465.37500	MO	20K0F3E