

**Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
PRINCE GEORGE’S COUNTY,)	WT Docket No. 99-87
MARYLAND)	
)	
Request for Waiver of Section 90.209(b) of)	
the Commission’s Rules)	

1. The Prince George’s County Board of Education (“BOE”) respectfully requests a ninety (“90”) day waiver of the Federal Communications Commission (“FCC”) mandated VHF narrowbanding requirement for call signs WNQR912 and KGG251. The County anticipated compliance with the Commission’s Order in the 2012 calendar year; however, the conversion from VHF to 700 and 800 MHz has been delayed as result of the weather and other events beyond the control of the County’s BOE. Completion is anticipated by March 31, 2013.
2. Call signs WNQR912 and KGG251 are assigned to the BOE and are used to support school transportation as well as internal school security. In 2011, the School Board elected to transition its VHF radio system to the County’s newly constructed seventy-six million dollar (“\$76,000,000”) 700 and 800 MHz radio networks as the prime strategy for compliance with the Commission’s Order. To that end, the County has budgeted and/or spent an additional six million dollars (“\$6,000,000”) to acquire subscriber radios and technical services specifically for the BOE’s compliance with the Commission’s Order. All funding has been allocated for the narrowbanding of BOE radios.

3. Prince George's County operates a consolidated public school system supporting all children of residents desiring to receive a free education. There are no coordination requirements with the BOE radio license and other schools or school districts.
4. The scope of the BOE system is approximately 1,100 mobile radios and 750 portable radios. The vast majority of these radios are capable of narrowbanding. Any devices incapable of narrowbanding have been or will be replaced with new equipment; however, not all of the new radios have been installed or programmed due to the volume of equipment and limited County technical resources.
5. While these new communications devices will operate primarily in support of the BOE mission, the assets also represent valuable adjuncts to the County's Homeland Security program and can be integrated with other public safety assets if necessary. While this is a positive for the County's public safety program, radio technicians who perform the installation and programming of new BOE radios must also support first responder activities preparing for January's presidential inauguration. This constitutionally mandated event has affected the availability of staff resources and represents another reason why the BOE seeks this extension.
6. Any future improvements to the BOE system will be conducted on the County's 700 or 800 MHz systems which operate in full compliance with all Commission rules, including the important spectral efficiency rule as found in Subpart 535(d) of Part 90.
7. The County started the installation of equipment during the summer (2012) recess. As of this date we have installed approximately 70% of new 700 MHz mobile devices in vehicles. In addition, we have prepared for issuance 250 of the 750 portable radios to be used in the schools for staff security and related communications.

8. Because there are so few radios remaining on the VHF channels, the County contemplated shutting the VHF base stations down for the remaining period of time. However, after the recent unforeseen, horrible, and tragic occurrences at the Sandy Hook Elementary School in Newtown, CT, as well as other past tragedies at other institutions of learning; e.g. Columbine High School, Virginia Tech, etc., the County deemed such a shut-down of the system to be a detriment to student and faculty safety and not in the public interest.
9. With the County's land mobile communications resources now focused in the 700 and 800 MHz frequency bands, the BOE will cancel the VHF license upon the completion of narrowbanding activities.

The BOE requests that the Commission issue the relief requested and grants an extension for continued wideband operations until March 31, 2013.

Respectfully submitted,

Wayne A McBride

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