

**Before the  
Federal Communications Commission  
Washington D.C. 20554**

In the Matter of	)	
	)	
Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended	)	WT Docket No. 99-87
	)	
Promotion of Spectrum Efficient Technologies on Certain Part 90 Frequencies	)	RM-9332
	)	

**REQUEST FOR EXTENSION OF EXISTING WAIVER OF NATIONAL GRID**

**EXPEDITED ACTION REQUESTED**

National Grid, pursuant to Section 1.925 of the Federal Communications Commission’s rules respectfully requests an extension of the waiver of FCC Rule Section 90.209(b) granted on October 9, 2012. The granted waiver extended the January 1, 2013 deadline by which National Grid had to migrate its VHF and UHF licensed radio systems to 12.5 kHz or narrower technology and covered only the system licensed under call sign KRH760. The waiver is due to expire on June 1, 2013. National Grid is requesting an extension of the existing waiver until September 30, 2013. In support of this waiver request we present the following information.

**I. Background**

National Grid (LSE: NG; NYSE:NGG) is an electricity and gas company that connects consumers to energy sources through its networks. In the northeast US, National Grid connects more than seven million gas and electric customers to vital energy sources. National Grid delivers electricity to approximately 3.3 million customers in Massachusetts, New Hampshire, New York and Rhode Island. It manages the electricity network on Long Island under an agreement with the Long Island Power Authority (LIPA), and owns over 4,000 megawatts of contracted electricity generation, providing power to over one million LIPA customers. It is the largest distributor of natural gas in the northeastern U.S., serving approximately 3.4 million customers in New York, Massachusetts, New Hampshire and Rhode Island.

National Grid holds over 600 radio licenses issued by the FCC. Some 240 of those licenses were subject to the Commission's narrowbanding mandate. It met the narrowbanding deadline for all of its other operations with the exception of the system that is the subject of this waiver extension request.

## **II. Waiver Extension Request**

The radio system licensed under call sign KRH760 is located and operates on Nantucket Island, Massachusetts. As noted in the initial waiver request, National Grid has been engaged in the upgrade of its New England area two-way radio systems. This project is a multi-million dollar and multi-year project and is nearing completion. The Nantucket operations were included in this planning and the island is being converted from VHF to UHF as part of this large project. The transition from one band to another is in itself a major undertaking and the narrowbanding mandate added one more factor to the planning and implementation considerations.

One of the issues cited in the initial waiver request concerned difficulties associated with obtaining the transmitter site required for effective and efficient operation of the radio system. To meet the Nantucket RF coverage requirements at UHF, National Grid had to enter into a new site lease for tower and building space located at Verizon New England's wireless facility located on the island. Due to the inherent vagaries of dealing with a large corporate partner, the leasing process is taking far longer than initially predicted and expected. But the lease terms have in fact been finalized and the lease is currently being routed for execution. The lease is expected to finally be executed by both parties within the next two weeks.

Then local government steps in. The leased site facility requires a town permit in order for National Grid to install the antenna system and site generator. Construction permits cannot be pulled until the lease is fully executed and copies are available. This permit process is expected to take between two and six weeks. In an abundance of caution, National Grid is requesting a 120 day extension of the existing waiver.

National Grid has made a good faith effort to meet the narrowbanding deadline within the time frame of the existing waiver. The new base station, office control stations, and the mobile and portable radio equipment have been procured, assembled, programmed, and tested and are currently being stored on the island, ready for use but for the aforementioned siting and permit issues outside of National Grid's control. National Grid even went so far as to explore the use of a temporary location, sending personnel

to the island to install the base station at an alternate site but were unsuccessful due to the existing antenna systems on the tower not being in working order.

### **III. Operating Environment**

As noted in the initial waiver request, National Grid and its affiliates have a dominant presence on the frequencies covered by the existing waiver, on the island and surrounding areas. It has not received any complaints from any of its co- or adjacent channel users operating in the Nantucket area during the five month period that the waiver has been in place. Of course, should any issues arise during the time remaining that National Grid would operate in wideband mode, it is committed to working with any and all parties to resolve the issues.

### **IV. Conclusion**

In view of the foregoing, National Grid respectfully requests that the Commission extend the existing waiver for the system licensed under call sign KRH760 until September 30, 2013.

Respectfully submitted,

\_\_\_\_\_/s/ Nghia H. Lac

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May 30, 2013