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**HARFORD COUNTY GOVERNMENT**

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June 13, 2013

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12th Street, SW  
Room TW-A325  
Washington, DC 20554

RE: PS Docket 13-87

In response to the Public Notice of the Public Safety and Homeland Security Bureau (PSHSB)

Seeking comment on a petition for waiver filed by Central Maryland Area Radio

Communications (CMARC) allowing it to operate a regional interoperable communications

system in the 700 MHz narrowband spectrum utilizing the current 12.5 kHz channel efficiency

requirement until January 1, 2024, Harford County, MD fully supports this request and offers the

following comments:

- Central Maryland, including Harford County is home to almost one-half of Maryland's population. It also contains infrastructure critical to local, state and national interests. In Harford County, there are numerous critical transportation modes such as Interstate 95 and US 40, AMTRAK and CSX railways, the Susquehanna River and Chesapeake Bay, and numerous facilities that house vital services such as Aberdeen Proving Ground, Conowingo Dam, Upper Chesapeake Health Services (which includes two hospitals), and a community college. Additionally, Harford County hosts a variety of events that attract large crowds such as Ripken Stadium, Harford County Farm Fair, Maryland State BBQ Bash, a large recreational complex that hosts regional and national tournaments, and two large July 4 celebrations. As evidenced by the Boston Marathon bombings, voice radio interoperability is critical to public safety responses to natural and man-made disasters.
- The current 700 MHz regional voice system serves numerous day-to-day functions, such as coordinating dispatch center to dispatch center communications, communications with aviation assets and cross-jurisdiction communications needs. We also have secured Memorandums of Agreement with numerous public safety officials at all levels of government, to use the regional 700 MHz system in Central Maryland for voice interoperability.

- The cost to replace all subscriber radios in the region is more than \$100 million. In Harford County, we are facing replacement costs of \$18,000,000. While we plan to eventually phase in TDMA compliant radios, we cannot do it by 2017 due to the costs and workload required.
- Harford County must be very frugal in the use of our funds. Federal grants are disappearing and we continue to face unfunded mandates. The CMARC jurisdictions work closely together and interoperability is critical in the successful mitigation of emergencies. We cannot afford to relinquish this interoperability to meet the 2017 narrowband deadline.

Granting a waiver until January 1, 2024 is clearly in the best interest of public safety

(particularly in light of the recent disasters in Boston and Oklahoma) and in view of the factual circumstances outlined in the waiver request, we have no reasonable alternative to the current system until all subscriber radios are compliant with narrowbanding technology.

Sincerely,

A handwritten signature in blue ink that reads "Mary F. Chance". The signature is written in a cursive style with a large initial "M".

Mary F. Chance, Director  
Department of Administration  
Harford County, MD