

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.)

**REQUEST FOR TIME EXTENSION OF GRANTED WAIVER OF
COMMISSION RULES REGARDING THE SPECTRAL EFFICIENCY
OF PRIVATE LAND MOBILE RADIO SERVICES IN THE 150-174
AND 450-470 MHZ BANDS, REQUIRING 12.5 KHZ CHANNEL
BANDWIDTH OR EQUIVALENT TECHNOLOGY BY JANUARY 1,
2013**

WAIVER—EXPEDITED ACTION REQUESTED

TO: The Commission

I. INTRODUCTION

The County of St. Louis, (County) respectfully requests an amendment to the previously granted waiver of the January 1, 2013 narrowband deadline¹. The County supports the Commission's efforts to establish greater spectral efficiency, and has been taking measures to transition to a new 800 MHz trunked radio network and to comply with narrowband

¹ ORDER, DA12-245, Public Safety and Homeland Security Bureau, February 21, 2012

standards on spectrum that is to be retained after all of the public safety agencies are transitioned to the 800 MHz trunked system. As described in this PETITION, certain unique system implementation issues and situations have impacted the County's ability to meet the GRANTED WAIVER date of December 31, 2013.

II. BACKGROUND

The Commission, in the waiver approval ORDER, conditioned the grant to require filing by the public safety licensees and the County².

1. Any licensee in the St. Louis Urban Area seeking to have the waiver apply to its facilities must file a letter in ULS confirming that it consents to the terms of this Order and agrees to be bound by them
2. The County must file with the Commission a list of VHF/UHF frequencies and/or licenses that will be relinquished.

These conditions were met with the timely filing of all requested documents. This included a listing of frequencies to be RETAINED and frequencies to be RELINQUISHED.

On October 23, 2012 the County submitted a waiver modification to include both the RETAINED and TO BE RELINQUISHED frequencies in the narrowband extension waiver. This modification was approved by the Commission. By this modification, all currently licensed spectrum, below 470 MHz, issued by license to the County; or any of the public safety licensees within the county that consented to the terms of the waiver ORDER, are currently designated to be narrowband compliant by December 31, 2013.

² ORDER at para 14

The County and the public safety licensees within the county that consented to the terms of the waiver ORDER are continuing to work in earnest to construct, transition to, and operate the proposed 800 MHz trunked radio system. The original narrowband waiver request was based on the Extended Implementation Schedule that was attached to the 800 MHz licenses and had received Commission approval. Due to unanticipated delays in the implementation of the 800 MHz trunked system a revision of the Extended Implementation Schedule is currently submitted to the Commission and is attached to this petition as APPENDIX A.

The County was guided by the Commission's statement that the minimum time for narrowband extension should be requested. As such, the County proposed a very aggressive time line for completion of the 800 MHz trunked system. The County allowed minimal time for purchasing and implementation slippage. The County proposed and the Commission accepted that the frequencies to be RETAINED would be taken to narrowband compliance by December 31, 2013, and that RELINQUISHED frequencies would be returned by that same date.

The County seeks a modification of that ORDER which would extend both the RETAINED and RELINQUISHED frequency narrowband requirement to the new end date of the revised Extended Implementation Schedule, December 31, 2014. This would extend the system implementation, narrowband compliance, and spectrum turn back date by 12 months.

III. REASON AND IMPACT OF REQUESTED MODIFICATION

The County originally proposed an aggressive Extended Implementation Schedule in August 2010, during the early stage of system development, and provided this schedule to the Commission in support licensing of 800 MHz spectrum. When applying for the narrowband waiver the County used the same implementation schedule as reference. The schedule proposed that by December 2013 the new system would be operational. The County time estimate was very aggressive and did not envision several significant issues that caused the schedule to slip. Since that time it has become evident that the system cannot be made operational by the original date of December 31, 2013. Careful review by the County, the County's consultant, and the vendor under contract to construct the new 800 MHz trunked radio system, determined that a realistic new completion date is December 31, 2014. The new system completion date will bring the new system into operation in less than 5 years from the initial license application. This is within the time identified under Section 90.629 of the Commission's Rules as a maximum for an Extended Implementation

The County is continuing to move forward with all possible speed to bring the system on-line at the earliest possible time. Funding for the new system is secure and not part of the delay.

Several of the major issues that have caused delay include:

- Award of Contract - The County experienced a slight delay in the bid, evaluation and award process, but has now completed the process and selected the vendor under the procurement regulations of the County Government.
- Site Evaluation – The contract vendor has identified search rings, or general geographic locations, that are required to establish the vendor preliminary design criteria and indicated to the County where site development is needed. If a site

cannot be found within the search ring, due to FAA, historic preservation, or other environmental issues, a preliminary re-design is required to identify different search rings. This may increase the number of actual antenna sites to attain the same public safety grade coverage. The County has not been able to satisfy all of the system requirements for site locations. In addition, the County had intended to build ten (10) new towers, and utilize 15 existing structures; the number of new tower builds has now grown to 16.

- Site acquisition and development. – The final system design requires that the County procure sites and obtain FAA and FCC antenna structure approvals. The County has spent considerable time and money to locate sites that would clear the regulatory process and still provide the radio propagation characteristics required to provide public safety grade coverage. Recent FCC rule changes with obtaining Antenna Site Registration have caused many of the sites to be rejected or relocated and have added a significant number of months to the site development process. At this time not all of the required transmit sites have been identified and have received ASR approval. Without this approval, the County is unable to authorize the vendor to begin site construction.
- Regional Planning Issues – The St Louis Area UASI is situated at the border of FCC Region 24 and Region 13. It is required that any request for spectrum be coordinated between these two regional committees. This dual requirement has delayed the acquisition of the necessary spectrum commitments and is still in a tentative state until exact antenna sites are determined and these Committees are able to review the proposed interference plots using actual sites and associated transmitter parameters.

While both Regions have been very helpful, we understand the concern that is present with allotting spectrum where the actual interference contours have not yet been established. Since the committees are staffed by volunteers, the level of support and timeliness of action is somewhat restricted by scheduling.

- Coordination of Stakeholders – The County Emergency Communications

Commission, has appointed and tasked various law enforcement, fire and EMS sub-committees to identify the technical and operational requirements of each discipline. This required meeting and working with 67 law enforcement agencies, 43 fire protection districts and departments, and those of general county and municipal governmental agencies in St. Louis County to gather this data. With the number of agencies involved it was necessary to indoctrinate each committee with the knowledge of the new P-25-800 MHz Digital Trunked Simulcast Radio System that the agencies will use. While there is consensus that the system will benefit the participants, acquiring a better understanding of the system and the issues surrounding its technical capabilities has required much interaction and time to complete. In the midst of these activities the Vendor Project Manager and those of St. Louis County, St. Charles County, and Jefferson County 911 Board discussed and identified a significant cost saving measure to each locality by eliminating the need for three (3) duplicate System Master Switches by consolidating to one (1) Master Switch housed in St. Louis County with a back-up in St. Charles County and an off-line “Dark” Master at Jefferson County 911. This was a major design change involving 55 radio transmit sites and five (5) simulcast cells in the three (3) counties, which required re-engineering to reflect the new network configuration. The

intergovernmental agreements necessary for these system changes required preparation and execution of binding memorandums of understanding by the governing bodies of St. Louis County, St. Charles County and the Jefferson County 911 Board.

- Coverage Acceptance Testing – It is imperative that the coverage acceptance testing be done during the time period of peak foliage where RF attenuation is most intense. This provides the degree of system reliability assurance needed for the public safety grade system and is a significant contractual milestone that drives other project tasks related to final system acceptance and cutover. Site construction and FNE installations for the new radio system is scheduled to be complete by end of year 2013. Therefore, the next window of opportunity for coverage acceptance testing to begin would be May 2014.

IV. PROJECTED IMPACT TO OTHER LICENSEES

A. Impact to existing licensees.

The County anticipates that there will be no negative impact to any other licensee that is licensed and operating today. The County and the allied public safety licensees are currently licensed in wideband (20 kHz maximum occupied bandwidth) and will continue in wideband during the waiver. There will be no change to other existing licensees operation or interference level. Now that other existing licensees on adjacent channels are in compliance with the FCC's narrowband mandate; the possibility of receiving interference from the County or other allied licensees is significantly reduced.

B. Impact to a future licensee at UHF (450-470 MHz).

The County and/or other allied public safety licensees are currently operating on UHF channels with wideband (20 kHz maximum occupied bandwidth) emission. The FCC has authorized interstitial channels at UHF that are spaced at 12.5 kHz on center.

Many licensees have applied for authority to operate narrowband systems on the offset channels and are using geographic spacing to attain about 30 dB of Adjacent Channel Protection, which is the Adjacent Channel Coupled Power (ACCP) value assumed for UHF³. There will be no impact to these narrowband stations due to the continued operation of the County and other allied public safety agencies at wideband. There will be an undermined impact on the ability for new licensees to license channels at 12.5 kHz offset to the County and allied licensee frequencies, without the need to consider geographic spacing to attain adjacent channel protection. Without knowing which potential licenses may apply for the UHF spectrum, it is not possible to quantify the degree of impact. The County will work with new licensees in an attempt to mitigate the impact of continued wideband operation.

C. Impact to a future licensee at VHF (150-174 MHz).

The County and/or allied public safety licensees are currently operating on VHF channels with wideband (20 kHz maximum occupied bandwidth) emission. The FCC

³ See FCC DA97-2006 and Letter from Larry A. Miller, President, LMCC, to Daniel B. Phythyon, Chief, Wireless Telecommunications Bureau, Federal Communications Commission (Sept. 10, 1997).

had previously authorized channels at VHF that are spaced at 15 kHz on center; and in consideration of narrowbanding has authorized interstitial channels at 7.5 kHz on center. Both of these channel centers are impacted by a wideband emission of 20 kHz bandwidth. Many licensees are currently operating narrowband systems on the 15 and 7.5 kHz spaced channels, respectively, and are using geographic spacing to attain about 30 dB and 60 dB of Adjacent Channel Protection, which is the Adjacent Channel Coupled Power (ACCP). There will be no impact to these currently licensed stations due to the continued operation of the County or any of the allied public safety licensees at wideband. There will be an undetermined impact on the ability for new licensees to license channels at both 15 and 7.5 kHz offset to the County and allied licensee frequencies, without considering geographic spacing to attain adjacent channel protection. Without knowing which potential licensees may apply for the VHF spectrum, it is not possible to quantify the degree of impact. The County commits to working with the potential new licensees to permit early licensing of channels to the degree possible, considering interference impact to both the continuing County and allied public safety licensees and to new system operations.

V. LICENSES AND FREQUENCIES

Appendix B contains a MODIFIED list of the February 2, 2012 call signs that were originally granted a waiver of the spectral efficient standard due to transition of operations to the new 800 MHz Trunked system. Call signs for which an extension to the granted narrowband waiver is not being requested have been deleted from the original list.

Appendix C contains a list of the October 23, 2012 call signs and specific frequencies that were scheduled to be retained. These frequencies were included in the WAIVER

MODIFICATION request to receive the same delayed narrowband consideration as the RELINQUISHED spectrum. This list is as originally submitted and approved.

Presently, both RETAINED and RELINQUISHED spectrum have the same date for narrowband compliance, that being December 31, 2013. This PETITION requests to extend both the RETAINED and RELINQUISHED compliance date to December 31, 2014.

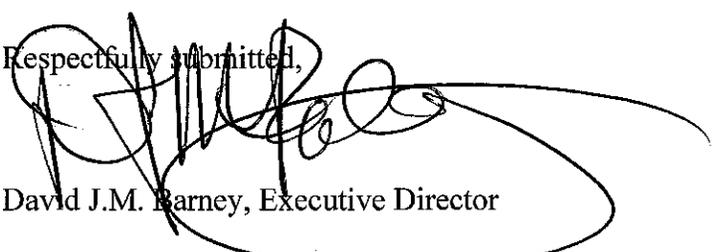
VI. CONCLUSION

As shown above, the County and allied public safety licensees have, and continue to work diligently and in good faith to comply with the 800 MHz trunked system Extended Implementation Schedule and with the Commission's spectral efficiency initiative.

The County seeks a modification of the WAIVER ORDER to extend the narrowband required compliance date to coincide with the new projected end date of the Extended Implementation Schedule, December 31, 2014.

For the reasons stated and in consideration of the public safety issues involved, the Commission is PETITIONED to grant the MODIFICATION of the NARROWBAND WAIVER ORDER.

Respectfully submitted,



David J.M. Barney, Executive Director

St Louis County Emergency Communications Commission

7900 Forsyth Boulevard, Clayton, Missouri 63105

APPENDIX A: REVISED 800MHZ EXTENDED IMPLEMENTATION SCHEDULE**Request for Extended Implementation Schedule****Expedited Consideration Requested****St Louis County Emergency Communications Commission of St Louis County, MO**

St Louis County, as part of the St. Louis Regional Communications Core Group, a consortium of governmental agencies in the Greater St. Louis Region consisting of the Counties of Franklin MO, St. Charles MO, Madison IL, Monroe IL, Jefferson MO, St. Clair IL, St. Louis MO, and the Independent City of St. Louis MO, requests consideration of SLOW GROWTH IMPLEMENTATION as defined in 47CFR 90.629.

In June 2008, the above-referenced governmental agencies elected to move forward with an

interoperability strategy with the adoption of the St. Louis Emergency Land Mobile Communications Plan. The Emergency Communications Plan is based on the following:

1. Networking independent digital county systems (i.e. system of systems). This consists of interconnecting various county Project 25 trunked digital radio\microwave systems using the new regional microwave system collocated at the county trunked radio sites to improve system reliability and provide regional connectivity.
2. Creating a highly tolerable fault tolerant infrastructure thereby supporting all emergency public safety communications within the region.
3. Designing a system with the capacity and functionality to support additional

non-emergency municipal users including local, county, regional, state and federal

users.
4. Implementing an open standard (Project 25 and IP) based system of systems that is compatible with regional, as well as the State of Illinois and State of Missouri interoperability initiatives, including Region 13 and 24 Regional Planning Committees.
5. Coordinating with critical infrastructure service providers in the region to improve interoperability and share infrastructure where practical.

Overall Objectives

The St. Louis Regional Communications Core Group decided to design a seamless regional interoperability emergency communications network that would efficiently utilize existing spectrum. The required policies and procedures for all members of the St. Louis Regional Communications Core Group (the Regional coordination and governance entity) are

currently under further development. Three of the four Missouri localities without P-25

systems, including St Louis County, have secured funding for the procurement and

implementation of new microwave and P-25 radio and related emergency systems.

Background

St Louis County, and local entities contained therein, have current radio systems based on vintage conventional communications system architecture. These older systems are also using a significant number of VHF frequency channels that were allocated when the systems were initially installed meanwhile the number of radio users and system requirements have increased significantly throughout the County.

These congested outdated systems frequently experience routine severe radio congestion and that forces agencies to limit access to these capacity stressed systems. This then limits interoperability with public service and public safety organizations in the region due to the limited capacity of the existing channels.

Status of System Implementation

St Louis County has secured funding for implementing a county-wide system to support all

Public Safety agencies that operate within the County, with capacity to support regional interoperable communications for all St Louis Regional Communication participants. Award was made to a vendor to provide and install the communications system. Land use processes are continuing as are FCC required Antenna Structure Registrations. Building permits have been issued for several of the sites so far and construction of sites is planned to commence in Q3, 2013.

St. Louis County has also made significant progress preparing for the implementation of the new radio system by taking early deployment of thousands of subscriber radios. This has allowed the County to begin the installation of mobile radios. Pilot testing of codeplugs is

under way to work out the nuances of radio operations. The County is collaborating with authorities in local municipalities, the region, and statewide to develop a comprehensive fleetmap in preparation for programming. By completing these activities, the time it takes to cutover to the new radio system after final acceptance is greatly reduces.

Proposed Extended Implementation Schedule

2010	
2nd Quarter	Radio Specifications Updates Initiated
3rd Quarter	Radio System RFP's Released
4th Quarter	Review & Evaluation Initiated
2011	
1st Quarter	Bid Evaluation Continues
2nd Quarter	Negotiations for contract commence
3rd Quarter	Negotiations continue
4th Quarter	St Louis County Contracts Awarded
2012	
1st Quarter	Site Acquisition Begins
2nd Quarter	Site Acquisition Continues
3rd Quarter	Site Acquisition Continues – Initial FCC Licenses Issued 8/3/2012
4th Quarter	Site Acquisition Continues - Begin ASR Process
2013	
1st Quarter	Site Acquisition Continues - ASR Process Continues
2nd Quarter	ASR Issues NEPA/SHPO/FAA in Progress
3rd Quarter	Begin site construction – Begin updating Regional planning process
4th Quarter	Site Construction and Fixed Base Installations Continue (on air for testing)
2014	
1st Quarter	System Optimization and Acceptance Testing
2nd Quarter	Coverage Acceptance Testing
3rd Quarter	Final Radio System Acceptance and Project Closeout – Begin Cutover
4th Quarter	User Transition Complete – Abandon and Surrender Legacy Frequencies

Summary

Extremely large systems routinely take the full five years allowed under Section 90.629 of the Commission’s rules and in fact, there have been instances that those systems have taken even longer than the Commission’s rules permit. Further, in Paragraph (a)(2), the St Louis County system is part of a coordinated and integrated wide area system, which will require more than 12 months to purchase, construct and place into operation. The County has made significant progress toward implementation of the system at this time. Therefore, with good

cause shown, it is in the public interest, convenience and necessity to grant the subject request for extended implementation. Such extended implementation authority is in the public interest and will foster the development of total interoperability in the St Louis Urban Area Security Initiative plan.

APPENDIX B: VHF/UHF RADIO AUTHORIZATIONS

MODIFIED LIST OF CALL SIGNS GRANTED UNDER ORIGINAL WAIVER DATED FEBRUARY 21, 2012. THOSE AN EXTENSION IS NOT BEING REQUESTED HAVE BEEN DELETED.

Callsign	License FRN	Licensee Name
KLI986	0004752366	BALLWIN, CITY OF
WNB943	0004752366	BALLWIN, CITY OF
KYS891	0002510600	BEL RIDGE, VILLAGE OF
KDD997	0008115362	BERKELEY, CITY OF
KNGA967	0008115362	BERKELEY, CITY OF
WQLX919	0008115362	BERKLEY, CITY OF - PUBLIC WORKS DEPT.
WPPZ324	0012999736	BEVERLY HILLS, CITY OF
KNIH353	0002540524	BLACKJACK, CITY OF
KAD965	0002514446	BRENTWOOD, CITY OF
KAX585	0002514446	BRENTWOOD, CITY OF
KB90639	0002514446	BRENTWOOD, CITY OF
KIZ203	0002514446	BRENTWOOD, CITY OF
KGW715	0002510113	BRIDGETON, CITY OF
KQP620	0002510113	BRIDGETON, CITY OF
KVR948	0002510113	BRIDGETON, CITY OF
WNPM675	0002510113	BRIDGETON, CITY OF
KAF919	0003903481	CENTRAL COUNTY EMERGENCY 911
KNAA594	0003903481	CENTRAL COUNTY EMERGENCY 911
WNJZ901	0003903481	CENTRAL COUNTY EMERGENCY 911
WPDN529	0003903481	CENTRAL COUNTY EMERGENCY 911
WPTF687	0003903481	CENTRAL COUNTY EMERGENCY 911
WPYL622	0003903481	CENTRAL COUNTY EMERGENCY 911
WQBP945	0003903481	CENTRAL COUNTY EMERGENCY 911

WQKQ484	0003903481	CENTRAL COUNTY EMERGENCY 911
KB65536	0002510568	CHARLACK, CITY OF
KDN462	0002514065	CLAYTON, CITY OF
KNCV288	0002514065	CLAYTON, CITY OF
KNHS875	0002510352	COOL VALLEY, CITY OF
KNHW504	0002510352	COOL VALLEY, CITY OF
KNIK936	0002510352	COOL VALLEY, CITY OF
KNIZ671	0004189544	CRESTWOOD, CITY OF
KFN575	0002510642	CREVE COEUR, CITY OF
KNDY231	0002510642	CREVE COEUR, CITY OF
WNXR498	0002510642	CREVE COEUR, CITY OF
KOL768	0002510253	DES PERES, CITY OF
WQA732	0012982161	DES PERES, CITY OF
WYG503	0008799389	EDMUNDSON, CITY OF
KUG660	0012579488	ELLISVILLE, CITY OF PUBLIC WORKS
KWT733	0013479761	EUREKA, CITY OF
WNMJ345	0002547412	FENTON, CITY OF
KAG843	0002513711	FERGUSON, CITY OF
KDZ410	0002513711	FERGUSON, CITY OF
KJA399	0002513711	FERGUSON, CITY OF
KKL533	0002513711	FERGUSON, CITY OF
KTS741	0002513711	FERGUSON, CITY OF
KAK437	0005654074	FLORISSANT, CITY OF
KCE423	0005654074	FLORISSANT, CITY OF
KDP315	0002513679	FLORISSANT, CITY OF
WNJG307	0005654074	FLORISSANT, CITY OF
WZU919	0005654074	FLORISSANT, CITY OF
KDJ559	0002511004	FRONTENAC, CITY OF
WNAR657	0002511004	FRONTENAC, CITY OF

WNHY209	0002511004	FRONTENAC, CITY OF
KAF654	0007801475	GLENDALE, CITY OF
KFD596	0007801475	GLENDALE, CITY OF
KTO531	0005653738	HAZELWOOD, CITY OF
WPVW325	0005653738	HAZELWOOD, CITY OF
WPXV740	0005653738	HAZELWOOD, CITY OF
KAG586	0004752903	JENNINGS, CITY OF
KNFA348	0002511897	JENNINGS, CITY OF
KNNF498	0004752911	JENNINGS, CITY OF
KAB267	0002513182	KIRKWOOD, CITY OF
KBA754	0002513182	KIRKWOOD, CITY OF
KJD219	0002513182	KIRKWOOD, CITY OF
KAA516	0002513133	LADUE, CITY OF
KDP333	0002513133	LADUE, CITY OF
KNBT896	0005654017	LADUE, CITY OF
WYZ359	0002513133	LADUE, CITY OF
KDW983	0002509990	MANCHESTER, CITY OF
WPNU640	0002509990	MANCHESTER, CITY OF
KAF575	0002512861	MAPLEWOOD, CITY OF
KDP976	0002512861	MAPLEWOOD, CITY OF
WQL501	0002512861	MAPLEWOOD, CITY OF
WNDC578	0007007271	MARYLAND HEIGHTS, CITY OF
WNVH212	0005661350	MEHLVILLE FIRE PROTECTION DISTRICT
WNXB746	0005661350	MEHLVILLE FIRE PROTECTION DISTRICT
KCW721	0003903481	MONARCH FIRE PROTECTION DISTRICT
KM9118	0003903481	MONARCH FIRE PROTECTION DISTRICT
WQJB922	0016598641	MRS RADIO
WPIG779	0013957600	NORMANDY, CITY OF
KBG256	0002542421	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM

KXO621	0002542421	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KAE752	0002542421	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM, INC.
KB60907	0010641561	OLIVETTE, CITY OF
KBJ204	0007725625	OLIVETTE, CITY OF
KCU299	0007725625	OLIVETTE, CITY OF
KYD815	0002512531	OLIVETTE, CITY OF
KAD427	0002512515	OVERLAND, CITY OF
KLR430	0002512515	OVERLAND, CITY OF
KVV914	0005653746	PAGEDALE, CITY OF
WQC622	0005653746	PAGEDALE, CITY OF
KAD543	0005658117	RICHMOND HEIGHTS, CITY OF
KNAX731	0005658117	RICHMOND HEIGHTS, CITY OF
KNBV304	0005658117	RICHMOND HEIGHTS, CITY OF
WNVD911	0013556568	ROCK HILL, CITY OF
WNVW266	0004752655	ROCK HILL, CITY OF
WPTQ524	0005653894	ROCK HILL, CITY OF
KDP310	0009834458	SAINT ANN, CITY OF
KTE559	0002512127	SAINT ANN, CITY OF
WPMQ517	0009599200	SAINT JOHN, CITY OF
KAA519	0002511897	SAINT LOUIS, COUNTY OF
KB21164	0002511897	SAINT LOUIS, COUNTY OF
KBH779	0002511897	SAINT LOUIS, COUNTY OF
KBV825	0002511897	SAINT LOUIS, COUNTY OF
KD5414	0002511897	SAINT LOUIS, COUNTY OF
KEW985	0002511897	SAINT LOUIS, COUNTY OF
KJE232	0002511897	SAINT LOUIS, COUNTY OF
KNBU687	0002511897	SAINT LOUIS, COUNTY OF
KNDR655	0002511897	SAINT LOUIS, COUNTY OF
KZC638	0002511897	SAINT LOUIS, COUNTY OF

WNFX701	0002511897	SAINT LOUIS, COUNTY OF
WPDQ259	0002511897	SAINT LOUIS, COUNTY OF
WPFJ479	0002511897	SAINT LOUIS, COUNTY OF
WRA409	0002511897	SAINT LOUIS, COUNTY OF
KA21119	0004752515	SHREWSBURY, CITY OF
KAG297	0002511731	SHREWSBURY, CITY OF
WPLV535	0002511731	SHREWSBURY, CITY OF
WXB922	0002511731	SHREWSBURY, CITY OF
WPKY463	0002530111	SOUTH COUNTY FIRE ALARM ASSN INC
KAK618	0002530111	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KZB287	0002530111	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KLW330	0002547255	ST LOUIS COMMUNITY COLLEGE AT FLORISSANT VALLEY
KRT720	0002547255	ST LOUIS COMMUNITY COLLEGE AT MERAMEC
KA96529	0002511897	ST LOUIS, COUNTY OF
KAL741	0002511897	ST LOUIS, COUNTY OF
KNFH767	0002511897	ST LOUIS, COUNTY OF
KNFU316	0002511897	ST LOUIS, COUNTY OF
KXX628	0002511897	ST LOUIS, COUNTY OF
WNZF597	0002511897	ST LOUIS, COUNTY OF
WPNX681	0002511897	ST LOUIS, COUNTY OF
KJG922	0013656392	SUNSET HILLS, CITY OF
KVT878	0002510394	SUNSET HILLS, CITY OF
KDG344	0005653696	TOWN AND COUNTRY, CITY OF
KAA875	0005653803	UNIVERSITY CITY, CITY OF
KDK629	0002511533	UNIVERSITY CITY, CITY OF
KJR350	0002511533	UNIVERSITY CITY, CITY OF
WPRH361	0002511897	VALLEY PARK, CITY OF
WYR605	0002510311	WARSON WOODS, CITY OF
KLU447	0007007065	WASHINGTON UNIVERSITY

KAB954	0002511392	WEBSTER GROVES, CITY OF
KCK557	0002511392	WEBSTER GROVES, CITY OF
KOM549	0002511392	WEBSTER GROVES, CITY OF
KLY812	0002510444	WOODSON TERRACE, CITY OF

APPENDIX C: VHF/UHF RADIO AUTHORIZATIONS

CALLSIGNS AND SPECIFIC FREQUENCIES TO BE RETAINED FOR SPECIAL OPERATIONS AND INTEROPERABILITY AFTER SUCCESSFUL IMPLEMENTATION OF THE 800 MHZ SYSTEM

Callsign	Frequency	Licensee Name
KLI986	154.7250	BALLWIN, CITY OF
KLI986	155.3700	BALLWIN, CITY OF
WNBY943	154.9800	BALLWIN, CITY OF
KNGA967	154.7250	BERKELEY, CITY OF
KNGA967	155.3700	BERKELEY, CITY OF
KNGA967	155.4750	BERKELEY, CITY OF
KNGA967	156.0900	BERKELEY, CITY OF
KB90639	155.2200	BRENTWOOD, CITY OF
KB90639	155.3400	BRENTWOOD, CITY OF
KAF919	154.2200	CENTRAL COUNTY EMERGENCY 911
KAF919	154.2800	CENTRAL COUNTY EMERGENCY 911
KAF919	153.8300	CENTRAL COUNTY EMERGENCY 911
KAF919	154.4300	CENTRAL COUNTY EMERGENCY 911
KAF919	159.1200	CENTRAL COUNTY EMERGENCY 911
WPDN529	155.3250	CENTRAL COUNTY EMERGENCY 911
WPTF687	154.2200	CENTRAL COUNTY EMERGENCY 911
WPTF687	154.2800	CENTRAL COUNTY EMERGENCY 911
WPTF687	154.4300	CENTRAL COUNTY EMERGENCY 911
WPTF687	155.2800	CENTRAL COUNTY EMERGENCY 911
WQKQ484	155.2200	CENTRAL COUNTY EMERGENCY 911
WQKQ484	155.3400	CENTRAL COUNTY EMERGENCY 911
KOL768	155.4750	DES PERES, CITY OF

KWT733	158.9250	EUREKA, CITY OF
KWT733	155.3700	EUREKA, CITY OF
KWT733	153.9950	EUREKA, CITY OF
KJA399	155.7600	FERGUSON, CITY OF
KTS741	155.7600	FERGUSON, CITY OF
KDJ559	155.1000	FRONTENAC, CITY OF
WYZ359	159.1800	LADUE, CITY OF
WNXB746	155.7000	MEHLVILLE FIRE PROTECTION DISTRICT
WQJB922	154.7250	MRS RADIO
WQJB922	155.3700	MRS RADIO
WQJB922	155.4750	MRS RADIO
WQJB922	155.9250	MRS RADIO
WPIG779	159.1650	NORMANDY, CITY OF
KBG256	154.2800	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KBG256	154.3250	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	462.9500	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	462.9750	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	463.0000	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	463.0250	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	463.0500	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	463.0750	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	463.1000	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	463.1250	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	463.1500	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KXO621	463.1750	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KAE752	154.2800	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KAE752	154.3250	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM
KAE752	154.4000	NORTH CENTRAL COUNTY FIRE ALARM SYSTEM

KB60907	463.0750	OLIVETTE, CITY OF
KVV914	155.7750	PAGEDALE, CITY OF
KVV914	155.9250	PAGEDALE, CITY OF
WQC622	154.7250	PAGEDALE, CITY OF
WQC622	155.3700	PAGEDALE, CITY OF
WQC622	155.4750	PAGEDALE, CITY OF
KNAX731	151.0550	RICHMOND HEIGHTS, CITY OF
KNAX731	154.2800	RICHMOND HEIGHTS, CITY OF
KNAX731	154.3700	RICHMOND HEIGHTS, CITY OF
WPTQ524	154.7250	ROCK HILL, CITY OF
WPTQ524	155.3700	ROCK HILL, CITY OF
WPTQ524	155.4750	ROCK HILL, CITY OF
WPTQ524	155.5200	ROCK HILL, CITY OF
WPMQ517	155.3700	SAINT JOHN, CITY OF
WPMQ517	155.4750	SAINT JOHN, CITY OF
WPMQ517	155.6850	SAINT JOHN, CITY OF
KLW330	155.3700	ST LOUIS COMMUNITY COLLEGE AT FLORISSANT VALLEY
KLW330	155.5350	ST LOUIS COMMUNITY COLLEGE AT FLORISSANT VALLEY
KRT720	155.3700	ST LOUIS COMMUNITY COLLEGE AT MERAMEC
KRT720	155.5350	ST LOUIS COMMUNITY COLLEGE AT MERAMEC
KJE232	159.3900	SAINT LOUIS, COUNTY OF
KNDR655	460.5250	SAINT LOUIS, COUNTY OF
KNDR655	465.5250	SAINT LOUIS, COUNTY OF
KZC638	153.9800	SAINT LOUIS, COUNTY OF
KNFH767	154.7250	SAINT LOUIS, COUNTY OF
KNFH767	155.4750	SAINT LOUIS, COUNTY OF
KNFU316	150.9950	SAINT LOUIS, COUNTY OF
KNFU316	151.1000	SAINT LOUIS, COUNTY OF

KNFU316	151.1150	SAINT LOUIS, COUNTY OF
KNFU316	156.0600	SAINT LOUIS, COUNTY OF
KNFU316	158.9850	SAINT LOUIS, COUNTY OF
KNFU316	159.0000	SAINT LOUIS, COUNTY OF
KNFU316	159.0150	SAINT LOUIS, COUNTY OF
WNZF597	151.1150	SAINT LOUIS, COUNTY OF
KAK618	154.3100	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KAK618	154.4000	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KAK618	153.8300	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KZB287	155.2950	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KZB287	458.0250	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KZB287	458.0750	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KZB287	458.1250	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KZB287	458.1750	SOUTH COUNTY FIRE ALARM ASSOCIATION INC
KDG344	155.1000	TOWN AND COUNTRY, CITY OF
WQCA493	453.9875	UNIVERSITY CITY, CITY OF
WQCA493	458.9875	UNIVERSITY CITY, CITY OF