

**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)
)
Dorchester County, Maryland) WT Docket No. 99-87
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**On Behalf of Dorchester County, Maryland
REQUEST FOR WAIVER EXTENSION**

Dorchester County, Maryland, (“the County”), pursuant to Section 1.925 of the Commission’s rules and Public Notice, DA 11-1189 (released July 13, 2011), respectfully requests that the Commission waive Section 90.209(b)(5) of its rules to provide additional time for the County to comply with the requirement that it operate on channels with a bandwidth of 12.5kHz or less beginning January 1, 2013. This is also known as the “Narrowbanding deadline”. On December 20th 2012, the Commission granted Dorchester County’s original request for a waiver of the narrowband deadline until August 31, 2013.

The County has been working diligently to comply with the Narrowbanding mandate and complete this work inside of our original timeline including the extension to August 31, 2013. However several factors, discussed below, have resulted in the inability to comply with the August 31st deadline. The County respectfully requests that the Commission expeditiously grant this waiver extension request to continue operating our Countywide paging system on existing 25kHz channels through December 31, 2013, in order to allow the County to complete

the addition of the two additional transmitter sites needed to compensate for system coverage reduction as a result of narrowbanding.

Background

Dorchester County is one of Maryland's largest counties and also one of the most sparsely populated. It is approximately 600 square miles of land and 70 square miles of water with a population of approximately 33,000. The County's terrain is predominantly flat with a mixture of forested, farmland and wetlands and is almost completely surrounded by various waterways. Situated in the mid to lower part of the County is the Blackwater National Wildlife Refuge¹. The average population density is about 55 persons per square mile with most of the population located in the City of Cambridge, Hurlock and Vienna. Recently the County Emergency Services department lost valuable members of its staff due to retirement and attrition. Among them were employees who were directly responsible for the daily operations of the County radio and paging system. Upon their exit it was discovered that the necessary due diligence regarding narrowbanding had not been performed.

Petitioners' Extension Request

The Commission's Narrowbanding Extension Public Notice, DA 11-1189, contains a list of questions which the Commission requests that applicants seeking extension provide information on their extension requests. The following represents the County's response to those questions and issues.

¹ <http://www.fws.gov/blackwater/>

1. Steps Already Taken To Complete the Narrowbanding Transition

The County, working with its radio vendor, has performed both pre and post narrowbanding signal testing to determine the actual versus projected coverage throughout the County. Analysis has shown that converting our transmitter sites to narrowband operation will reduce the coverage to unacceptable levels. The system was then returned to Wideband operation. Engineering analysis was performed to determine the best course of action to achieve optimal coverage without interfering with neighboring counties. It was determined that a minimum of two additional transmitter sites were needed for optimal coverage. A proposal to rectify these deficiencies was developed including the required equipment and tower placement of said equipment. The proposal was approved and a contract has been signed to implement said proposal between the Dorchester County Council and the Motorola Corp.

2. System Size and Complexity

The existing County paging system (call sign KEO255) is used to alert the County's Volunteer fire fighters and the County EMS responders. It consists of three separate transmitter sites located throughout the central and southern parts of Dorchester County and one transmitter site located in Talbot County that covers the northern part of Dorchester County as well as the City of Cambridge all operating in Part 90 at 151.0700MHz. The system was originally designed to provide the best coverage possible while utilizing the County's existing tower infrastructure. With the current configuration there are a large number of areas with poor or marginal coverage.

3. Whether System Equipment Must Be Upgraded or Replaced

The County's existing transmitter sites are narrowband capable and will not need to be upgraded or replaced. All pagers used on the system are capable of operating on the narrowband. The County is in the process of adding two additional transmitter sites to accommodate narrowbanding. The County will rely on shared infrastructure from both the State of Maryland and County owned infrastructure to support the added sites.

4. Funding

The County has secured funding from a number of different sources that includes the issuance of Bonds, vendor leasing and direct County funds.

5. Narrowbanding Scheduling Dependencies

A new transmitter site will be located in the City of Cambridge on an existing County owned tower. It will be co-located in a new equipment facility to be constructed by the State of Maryland for the State's new 700MHz radio network. This facility was not completed until June of 2013. The County will also utilize space on a tower located in the Federalsburg area, owned by The state of Maryland.

6. Plans to Minimize Impact On Co-Channel and Adjacent Channel Licensees

The County hopes to minimize to the greatest extent possible interference to adjacent and co-channel licensees. To do so the County will use wide-band for the shortest amount of time possible, which is expected to be less than one year.

Conclusion

The County feels that it has met the needed criteria to justify a waiver under Part 1.925(b)(3) where the waiver may be granted if it is shown that either: “(i) the underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest;” or “(ii) in view of the unique or unusual factual circumstances of the instant case, application of the rules(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative.” Requiring Dorchester County to implement narrowband operation using their existing system without adding the needed additional sites would put the citizens of Dorchester County at significant risk as many of the areas of the county would be without adequate paging coverage. This will lead to instances where first responders would not be notified of an emergency. The County believes that it has shown a good faith effort to comply with the Commission’s rules but because of the reasons stated above the County will not be able to meet the August 31, 2013 deadline. The County respectfully requests that the Commission expeditiously grant this waiver extension request to continue operating our Countywide paging system on existing 25kHz channels through December 31, 2013.

Respectfully submitted,

*Director of Emergency Services
Dorchester County Emergency Services
829 Fieldcrest Road
Cambridge, MD 21613*

ID	Task Name	Duration	% Complete	Start	Finish	Predecessors	8		7	
1	Dorchester County Paging Project Project	152 days	0%	Mon 6/3/13	Tue 12/31/13					
2	Contract	1 day	0%	Mon 6/3/13	Mon 6/3/13					
5	Contract Design Review (CDR)	32 days	0%	Tue 6/4/13	Wed 7/17/13					
18	Project Kick-Off	4 days	0%	Thu 7/18/13	Tue 7/23/13					
23	FNE Order Processing	10 days	0%	Thu 7/18/13	Wed 7/31/13					
24	Order Administration	7 days	0%	Thu 7/18/13	Fri 7/26/13	16				
25	Make Order	3 days	0%	Mon 7/29/13	Wed 7/31/13	24				
26	Order Bridged	0 days	0%	Wed 7/31/13	Wed 7/31/13	25				
27	Revue Moscad solution	27 days	0%	Wed 8/7/13	Thu 9/12/13					
32	Non-Staged Site Equipment	73 days	0%	Thu 8/1/13	Mon 11/11/13					
36	Civil Construction / Development	54 days	0%	Mon 8/5/13	Thu 10/17/13					
37	Group A	54 days	0%	Mon 8/5/13	Thu 10/17/13					
38	Federalburg	49 days	0%	Mon 8/5/13	Thu 10/10/13					
39	NEPA assesment (Not Needed)	6 wks	0%	Mon 8/5/13	Fri 9/13/13					
40	Shelter upgrades	44 days	0%	Mon 8/12/13	Thu 10/10/13					
50	Tower Analysis	4 days	0%	Fri 8/16/13	Wed 8/21/13					
52	Cambridge Health Department	54 days	0%	Mon 8/5/13	Thu 10/17/13					
53	NEPA assesment (Not Needed)	6 wks	0%	Mon 8/5/13	Fri 9/13/13					
54	Shelter upgrades	49 days	0%	Mon 8/12/13	Thu 10/17/13					
64	Tower Analysis	4 days	0%	Fri 8/16/13	Wed 8/21/13					
66	Site Development Complete	0 days	0%	Thu 10/10/13	Thu 10/10/13	48,49				
67	System Integration	30 days	0%	Tue 11/12/13	Mon 12/23/13					
68	FNE Subsystem	8 days	0%	Tue 11/12/13	Thu 11/21/13					
69	Antennas & Lines Installation Federalburg	4 days	0%	Tue 11/12/13	Fri 11/15/13					
70	Deliver Antennas, Transmission Lines & Materials to Teltronics Tower	1 day	0%	Tue 11/12/13	Tue 11/12/13	35,66				

Project: Dorchester County MD Pa Date: Fri 8/9/13	Task		External Milestone		Manual Summary Rollup	
	Split		Inactive Task		Manual Summary	
	Milestone		Inactive Milestone		Start-only	
	Summary		Inactive Summary		Finish-only	
	Project Summary		Manual Task		Deadline	
	External Tasks		Duration-only		Progress	

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ID	Task Name	Duration	% Complete	Start	Finish	Predecessors	8		7	
71	Install Antennas and Transmission Lines	2 days	0%	Tue 11/12/13	Wed 11/13/13	70SS				
72	Ground / Terminate Transmission Lines	1 day	0%	Thu 11/14/13	Thu 11/14/13	71				
73	Sweep Lines	1 day	0%	Fri 11/15/13	Fri 11/15/13	72				
74	Antennas & Lines Installation Cambridge Health Department	4 days	0%	Mon 11/18/13	Thu 11/21/13					
75	Deliver Antennas, Transmission Lines & Materials to Teltronics Tower	1 day	0%	Mon 11/18/13	Mon 11/18/13	73				
76	Install Antennas and Transmission Lines	2 days	0%	Mon 11/18/13	Tue 11/19/13	75SS				
77	Ground / Terminate Transmission Lines	1 day	0%	Wed 11/20/13	Wed 11/20/13	76				
78	Sweep Lines	1 day	0%	Thu 11/21/13	Thu 11/21/13	77				
79	Antenna Installation Complete	0 days	0%	Fri 11/15/13	Fri 11/15/13	72,73				
80	FNE Installation	23 days	0%	Tue 11/12/13	Thu 12/12/13					
81	Customer must complete Narrowbanding of Pagers	0 days	0%	Fri 11/22/13	Fri 11/22/13	78				
82	Narrowbanding of existing RF sites	8 days	0%	Fri 11/22/13	Tue 12/3/13					
91	FNE Installation (Federalburg)	19 days	0%	Tue 11/12/13	Fri 12/6/13					
95	FNE Installation (Health Department)	4 days	0%	Mon 12/9/13	Thu 12/12/13					
99	FNE Installation Complete	0 days	0%	Thu 12/12/13	Thu 12/12/13	98				
100	FNE Installation Complete	0 days	0%	Thu 12/12/13	Thu 12/12/13	99				
101	System Optimization	7 days	0%	Fri 12/13/13	Mon 12/23/13					
117	System Close Out	6 days	0%	Tue 12/24/13	Tue 12/31/13					
126	Project Complete	0 days	0%	Tue 12/31/13	Tue 12/31/13	125				

Project: Dorchester County MD Pa Date: Fri 8/9/13	Task		External Milestone		Manual Summary Rollup	
	Split		Inactive Task		Manual Summary	
	Milestone		Inactive Milestone		Start-only	
	Summary		Inactive Summary		Finish-only	
	Project Summary		Manual Task		Deadline	
	External Tasks		Duration-only		Progress	

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