

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. Charles Missouri, (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 standards on spectrum that is to be retained after a all of the public safety

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

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 two conditions were met with the timely filing, by each affected jurisdiction, of all requested documents. This included a listing of frequencies to be RETAINED and frequencies to be RELINQUISHED.

On December 5, 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

² ORDER at para 14

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.

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 project slippage due to extended purchasing and implementation processes. 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 project schedule delays, most importantly site identification and acquisition. 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 and transition 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. Noted below are several of the major issues that have caused delay beyond what was anticipated. The review of issues includes a status update.

- Award of Contract - The County experienced a slight delay in the bid, evaluation and award process, but has completed the process, selected the vendor under the procurement regulations of the County Government and entered into a contract with the vendor on December 2, 2011.
- Site Evaluation – The contract vendor identified search rings, or acceptable geographic locations, required to establish the vendor’s final RF design criteria and indicated to the County where site development was needed based on the RF engineering of that design. In certain areas of the County the identification of acceptable site locations was hampered by a variety of issues, including numerous areas in close proximity to Lambert International Airport, historic landmarks, residential area restrictions, unwilling sellers and a large Superfund site. This process has been completed as of July, 2013.
- Site acquisition and development. – The final system design requires that the County procure sites, clear any permitting issues, 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. This process introduced considerable delay and has added a significant number of months to the site development process. At this time all of the required transmit sites have been identified acquired and have passed regulatory review and the County has secured all ASR registrations. Four of the twelve towers to be located in the County are either up or in the process of being built and steel for the others is on order and expected over the next thirty days. The County is working with the UASI area wide

microwave provider to coordinate installation of the microwave at the conclusion of the tower construction.

- Regional Planning Issues – The St Louis Area UASI spans FCC Regions 24 and 13. Any request for spectrum must be coordinated between these two regional committees. St. Charles County, St. Louis County and Jefferson County 9-1-1 approached Regions 24 and 13 in a coordinated request to obtain the necessary spectrum in 2011-2012. That request was based on a preliminary design with each county having a freestanding independent system that was coordinated. After Regions 24 and 13 recommended the spectrum allocation in 2012, St. Charles County, St. Louis County and Jefferson County met and determined to redesign the system as a single system spanning the three counties. Thus, with the final design and with the final site acquisition of all sites in St. Charles and Jefferson County and many of the sites in St. Louis County, the three counties have taken the final spectrum allocation request back to Regions 24 and 13, and with a recommendation by Region 13 and all necessary letters of concurrence received within the last week, the County is expecting Region 24 to forward their frequency applications with a positive recommendation within a matter of weeks.
- This final design and subsequent frequency application process have now allowed Regions 24 and 13 to review the proposed interference plots using actual sites and associated transmitter parameters. These two committees, chaired and staffed by volunteers, provided St. Charles County excellent guidance and a level of support and timeliness of action that greatly assisted the County in obtaining their review and

recommendation and the County has received concurrence for our final system design and frequency usage.

- System Re-design – As referenced earlier, during the early stages of system development St. Charles County, St. Louis County, and the 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 impacting six (6) simulcast cells which consisted of 55 radio sites in the three (3) counties and required re-engineering to reflect the new network configuration. The intergovernmental agreements necessary for these system changes requires preparation and execution of binding memorandums of understanding by St. Louis County, St. Charles County and the Jefferson County 911 Board. While the end result improves FCC recognized objectives of improved interoperability and efficiency, the time to discuss and come to agreement on the terms and to complete these agreements caused additional project time and resources.
- 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 mostly complete by end of

year 2013. Therefore, the next window of opportunity for coverage acceptance testing would be May to August 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 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

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).

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 licenses 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 list of the February 21, 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. This list is not expanded from that originally submitted and approved.

Appendix C contains a list of the December 5, 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 not expanded from the that 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, and seeks no more time than it believes is necessary.

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,

A handwritten signature in blue ink, appearing to read "Joann Leykam". The signature is written in a cursive, flowing style.

St. Charles County, Missouri

APPENDIX A: REVISED 800MHZ EXTENDED IMPLEMENTATION SCHEDULE**Request for Modification of Extended Implementation Schedule by
St. Charles County, Missouri
Expedited Consideration Requested**

The St. Charles 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. Charles County, have secured funding for the procurement and implementation of new microwave and P-25 radio and related emergency systems.

Background

St. Charles County, and local entities contained therein, has 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. Charles 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. All necessary processes are complete including issuance of Building Permits for the majority of the sites. Five sites have begun construction and all construction is expected to be complete no later than January 28, 2014.

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 Charles County contracts awarded
2012	
1st Quarter	Site Acquisition and Zoning Begins
2nd Quarter	Site Acquisition and Zoning Continues
3rd Quarter	Site Acquisition and Zoning Continues Initial FCC Licenses Issued 8/3/2012
4th Quarter	Site Acquisition and Zoning Continues Begin NEPA/SHPO/FAA/ASR Process
2013	
1st Quarter	Site Acquisition and Zoning Continues NEPA/SHPO/FAA/ASR Process Continues

2nd Quarter	NEPA/SHPO/FAA/ASR Continues
3rd Quarter	Begin Site Construction Begin updating Regional planning process
4th Quarter	Site Construction Continues Fixed Base Installations
2014	
1st Quarter	Begin System Optimization
2nd Quarter	System Optimization Continues Begin Coverage Acceptance Testing Begin System Acceptance Testing
3rd Quarter	Begin Cutover Final Radio System Acceptance and Users Operate on New System Begin Project Closeout
4th Quarter	Project Closeout Continues Legacy System Decommission Abandon and Surrender Legacy Frequencies

Summary

St. Charles County has been working to shore up schedule gaps caused by unanticipated delays. Site construction is underway with system testing anticipated in April, 2014. Under Section 90.629 of the Commission’s rules, extremely complex systems routinely are allowed a full five years for implementation and in fact, there have been instances that those systems have taken even longer than the Commission’s rules permit. Further, the St. Charles system is part of a coordinated and integrated wide area system, which will have necessitated the County to request a 12-month extension to construct and place the described system into operation. Such extended implementation authority will foster the development of complete and seamless interoperability in the St Louis Urban Area Security Initiative plan. Therefore, with good cause shown; it is in the public interest, convenience and necessity to grant the subject request for modification of extended implementation.

APPENDIX B: VHF/UHF RADIO AUTHORIZATIONS

CALLSIGNS GRANTED NARROWBAND FORBEARANCE UNDER ORIGINAL
WAIVER DATED FEBRUARY 21, 2012

Agency/Licensee	Call Sign	Freq
Central County	WSL519	153.8300
Central County	WSL519	154.2800
Central County	WSL519	154.4450
Lake St Louis, City of	WQBU605	153.7850
Lake St Louis, City of	WQBU605	155.3700
Lake St Louis, City of	WQBU605	155.4750
Lake St Louis, City of	WQBU605	159.1500
Lake St Louis, City of	WNIA930	453.4250
Lake St Louis, City of	WNIA930	458.4250
O'Fallon PD	KXZ610	154.7850
O'Fallon PD	KXZ610	155.6250
O'Fallon PD	KUI581	155.8950
O'Fallon PD	KXZ610	458.1375
St Charles, City of	WPKR407	33.4200
St Charles, City of	WPKR407	33.8600
St Charles, City of	WPKR407	33.8800
St Charles, City of	KA73235	153.8300
St Charles, City of	WPKR407	153.8300
St Charles, City of	WPKR407	153.9500
St Charles, City of	KA73235	154.2800
St Charles, City of	WPKR407	154.2800
St Charles, City of	WPKR407	154.3550
St Charles, City of	KA73235	154.4450
St Charles, City of	WPKR407	154.4450
St Charles, City of	KAA217	154.7250
St Charles, City of	KAA217	155.6250
St Charles, County of	KEC748	153.7100
St Charles, County of	WNXQ438	153.8300
St Charles, County of	WPVI793	153.8300
St Charles, County of	WPDF274	153.9050
St Charles, County of	WPVI793	154.0850
St Charles, County of	WPVI793	154.2650
St Charles, County of	WNXQ438	154.2800
St Charles, County of	WPVI793	154.2800

St Charles, County of	WPVI793	154.2950
St Charles, County of	WNXQ438	154.4450
St Charles, County of	WPVI793	154.4450
St Charles, County of	KNFR268	154.9500
St Charles, County of	WPSD979	155.2950
St Charles, County of	WQCC612	155.3100
St Charles, County of	WPVI793	155.3250
St Charles, County of	WPDF274	155.4750
St Charles, County of	WPDF274	155.4900
St Charles, County of	WPDJ634	155.4900
St Charles, County of	WPDF274	155.7300
St Charles, County of	WQCC612	155.9700
St Charles, County of	KNFR268	156.0000
St Charles, County of	WPDF274	156.0000
St Charles, County of	WPDF274	156.1500
St Charles, County of	KEC748	158.7450
St Charles, County of	WPVI793	158.8350
St Charles, County of	WPVI793	158.8650
St Charles, County of	KCR227	159.1050
St Charles, County of	WPDF274	159.3525
St Charles, County of	WQAS437	458.5500
St Charles, County of	WQAS437	458.9750
St Charles, County of	KNFR268	460.0875
St Charles, County of	KNFR268	460.1125
St Charles, County of	WQIG963	460.1875
St Charles, County of	WPQA797	460.2875
St Charles, County of	WPDF274	460.3000
St Charles, County of	WQIG963	465.1875
St Charles, County of	WPQA797	465.2875
St Charles, County of	WPDF274	465.3000
St Charles, County of	WQIV390	461.3875
St Charles, County of	WQIV390	462.0625
St Charles, County of	WQIV390	466.3875
St Charles, County of	WQIV390	467.0625
St Peters, City of	WNDE796	155.3100
St Peters, City of	KKD426	155.3700
St Peters, City of	KKD426	155.4750
St Peters, City of	KKD426	155.9700
St Peters, City of	WNDE796	155.9700
Wentzville	WQG926	154.1150

Wentzville	KUQ880	154.8600
Wentzville	KUS658	155.0700
Wentzville	KUS658	155.4900
Wentzville	KUQ880	156.0300

APPENDIX C: VHF/UHF RADIO AUTHORIZATIONS

CALLSIGNS AND SPECIFIC FREQUENCIES GRANTED NARROWBAND FORBEARANCE UNTIL DECEMBER 31, 2013 UNDER WAIVER MODIFICATION; TO BE RETAINED FOR SPECIAL OPERATIONS AND INTEROPERABILITY AFTER SUCCESSFUL IMPLEMENTATION OF THE 800 MHZ SYSTEM

Licensee	Call sign	Frequency
Central County Fire and Rescue	WSL519	154.0850
Cottleville	KNJG666	158.8650
New Melle	WPKH797	150.0850
New Melle	WPKH797	150.9500
New Melle	WPKH797	155.3700
New Melle	WPKH797	155.4750
O'Fallon PD	KXZ610	154.4750
O'Fallon PD	KXZ610	154.9500
O'Fallon PD	KXZ610	155.3700
O'Fallon PD	KXZ610	155.4750
St Charles County Ambulance Dist	KZ4029	155.2200
St Charles County Ambulance Dist	KZ4029	155.3400
St Charles County Ambulance Dist	KZO390	155.9400
St Charles County Ambulance Dist	KZO390	158.8350
St Charles County Ambulance Dist	KZ4029	463.0000
St Charles County Ambulance Dist	KZ4029	463.0250
St Charles County Ambulance Dist	KZ4029	463.0500
St Charles County Ambulance Dist	KZ4029	463.0750
St Charles County Ambulance Dist	KZ4029	463.1000
St Charles County Ambulance Dist	KZ4029	463.1250
St Charles County Ambulance Dist	KZ4029	463.1500
St Charles County Ambulance Dist	KZ4029	463.1750
St Charles County Ambulance Dist	KZ4029	467.9500
St Charles County Ambulance Dist	KZ4029	467.9750
St Charles County Ambulance Dist	KZ4029	468.0000
St Charles County Ambulance Dist	KZ4029	468.0250
St Charles County Ambulance Dist	KZ4029	468.0500
St Charles County Ambulance Dist	KZ4029	468.0750
St Charles County Ambulance Dist	KZ4029	468.1000
St Charles County Ambulance Dist	KZ4029	468.1250
St Charles County Ambulance Dist	KZ4029	468.1500
St Charles County Ambulance Dist	KZ4029	468.1750

St Charles, City of	WPKR407	154.2500
St Charles, City of	KAA217	155.3700
St Charles, City of	KAA217	155.4750
St Charles, City of	WQDN911	453.3125
St Charles, City of	WQEY788	453.6375
St Charles, City of	WPIN963	453.9500
St Charles, City of	WQDN911	458.3125
St Charles, City of	WQEY788	458.6375
St Charles, City of	WPIN963	458.9500
St Charles, City of	WQDN911	460.3625
St Charles, City of	WQDN911	465.3625
St Charles, County of	KNFR268	153.9200
St Charles, County of	WPDF274	153.9200
St Charles, County of	WPDJ634	153.9200
St Charles, County of	WPVI793	153.9200
St Charles, County of	WNXQ438	154.2500
St Charles, County of	WPVI793	154.2500
St Charles, County of	WPDF274	155.3700
St Charles, County of	KNFR268	155.8350
St Charles, County of	KNFR268	155.9400
St Charles, County of	WPVI793	155.9400
St Charles, County of	WPLX256	458.9625
St Peters, City of	KKD426	155.3100
St Peters, City of	KKD426	155.3700
St Peters, City of	KKD426	155.4750
St Peters, City of	WGJ507	173.2100
St Peters, City of	KD20527	453.0125
St Peters, City of	KB88145	453.4375
Wentzville	KUS658	155.3700
Wentzville	KUS658	155.4750