

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

In the Matter of)	
)	
47 CFR §90.531(b)(2))	PS Docket No. 13-87
)	
Petition for Waiver to permit operation on)	
Narrowband reserve channels)	

To: Chief, Public Safety and Homeland Security Bureau

PETITION FOR WAIVER OF 47 CFR §90.531(b)(2)

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December 12, 2013

SUMMARY

Pursuant to Section 1.925 of the Commission's rules, the State of Maryland seeks a waiver of Section 90.531(b)(2) of the Commission's rules, 47 CFR §90.531(b)(2), to allow the State to utilize a subset of the twenty-four ("24") 700 MHz "reserve" channels as may be permitted by the Commission. Maryland intends to coordinate its proposed use of this spectrum with the Washington Metropolitan Area Transit Authority ("WMATA") as well as any other proximate licensee authorized by the Commission to use this spectrum.

Pursuant to Governor Martin O'Malley's Executive Order 01.01.2008.07 and operating under the guidance of the Maryland Statewide Interoperability Executive Committee ("SIEC"), the State of Maryland is implementing a spectrally efficient P25 Phase II statewide public safety 700 MHz communications system that is being used by federal, State, and local government public safety personnel and is known as the Maryland First Responders Interoperable Radio System Team ("Maryland FiRST"). The first two phases of Maryland FiRST are now on the air providing communications on Maryland's Eastern Shore and over to the I-95 corridor between Anne Arundel County and the Delaware State line.

The primary 700 MHz spectrum vehicle for Maryland FiRST are the "state" channels identified in 47 CFR §90.531(b)(5). Through a voluntary allotment of these "state" channels, Maryland has worked with the District of Columbia, the States of Delaware and West Virginia as well as the Commonwealths of Pennsylvania and Virginia to utilize the spectrum efficiently and without interference to neighbors. This voluntary allotment of spectrum has worked well and Maryland FiRST has used available "state" channels to their fullest capability. Notwithstanding the outstanding cooperation of neighboring states, there is too little "state" 700 MHz spectrum to support all of the channel assignments required by Maryland FiRST. The Maryland FiRST system has also benefited by excellent cooperation from Regional Planning Committee Twenty ("Region 20"); however, in many parts of central Maryland, the available pool of "state" and general pool channels has been exhausted.

For the foregoing reasons, the State of Maryland seeks the requested waiver.

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The State of Maryland (“Maryland” or “State”), respectfully submits this Petition for Waiver (“Petition”) seeking permission to utilize a subset of the twenty-four (“24”) 700 MHz “reserve” channels as may be permitted by the Commission. The following is submitted in support thereof:

INTRODUCTION

1. To obtain a waiver of the Commission’s rules, a petitioner must demonstrate either that: “(i) [t]he 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 waiver would be in the public interest; or (ii) [i]n view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative.”¹ The unique factual circumstances of this case support grant of the requested waiver.

2. As discussed in greater detail below, the Maryland FiRST 700 MHz statewide radio system serves a vital public safety purpose by providing operability and interoperability with federal, State, and local government first responders. Due to the lack of 700 MHz frequencies available for system expansion, Maryland is fast running out of spectrum to support all of the channel assignments required by Maryland FiRST. After the “state” 700 MHz spectrum is allotted between Maryland and its

¹ 47 C.F.R. § 1.925(b)(3)(i) and (ii).

neighbors, the 700 MHz “state” spectrum is largely depleted. To complete the statewide public safety radio system and meet future spectrum requirements without causing potential interference to neighbors, Maryland has no reasonable alternative but to seek the use of the reserve 700 MHz channels. Under the circumstances, their continued set aside would therefore be inequitable, unduly burdensome and contrary to the public interest. Accordingly, the requested waiver should be granted.

3. Pursuant to Governor Martin O’Malley’s Executive Order 01.01.2008.07 and operating under the guidance of the Maryland Statewide Interoperability Executive Committee (“SIEC”), the State of Maryland is implementing a spectrally efficient statewide P25 Phase II public safety 700 MHz land mobile radio (“LMR”) communications system that is currently (and will be) used by federal, State, and local government first responders. This system is known as the Maryland First Responders Interoperable Radio System Team (“Maryland FiRST”). Primary users today include but are not limited to components of the Maryland State Police (“MSP”), the Maryland Transportation Authority (“MDTA”), Department of Public Safety and Correctional Services (“DPSCS”), Maryland Capital police, University of Baltimore police, Maryland National Guard, and Maryland Port Authority security as well as several federal agencies operating in Baltimore and the northern I-95 corridor plus Kent County on Maryland’s Eastern Shore.

4. The first two phases of Maryland FiRST are now on the air providing operational communications on Maryland’s Eastern Shore and over to the northern I-95 corridor between Anne Arundel County and the Delaware State line. Approximately two thousand five hundred (2,500) State and local radios are operating on the system now with many more scheduled to go on the air in the immediate future when the project’s second phase becomes operational in early 2014. Fixed radio equipment for the third phase, which includes much of central Maryland west of I-95 was authorized by the 2013 Maryland General Assembly and will be installed in 2014.

By the first 700 MHz FCC threshold completion date for the use of “state” spectrum,² Maryland FiRST intends to be operational in Baltimore City and all of the counties throughout the State except Allegany, Calvert, Charles, Garrett, Montgomery, Prince George’s, St. Mary’s, and Washington counties. It is anticipated that Maryland FiRST will be completed and fully operational statewide before the second FCC threshold completion date³ for the use of “state” 700 MHz channels.

5. The primary 700 MHz spectrum vehicle for Maryland FiRST are the “state” channels identified in 47 CFR §90.531(b)(5). Through a voluntary allotment of these “state” channels, Maryland has cooperated with the District of Columbia, the States of Delaware and West Virginia as well as the Commonwealths of Pennsylvania and Virginia to utilize the spectrum fully, efficiently, and without interference to neighboring states. This voluntary allotment of spectrum has worked well and Maryland FiRST has used available “state” channels to their fullest capability. Notwithstanding the outstanding cooperation of neighboring states, “state” spectrum is insufficient to support all of the channel assignments Maryland FiRST requires. The Maryland FiRST system has also benefited by excellent cooperation from Regional Planning Committee Twenty (“Region 20”); however, in many parts of central Maryland, the available pool of “state” and “general pool” channels has been exhausted. In Index II of this Petition, Maryland FiRST provides a complete listing of current spectrum use throughout the State with comments detailing any technical impacts.

6. Additionally, Maryland FiRST is now reaching the potential of contention for 700 MHz spectrum with local government public safety partners. Some counties are contemplating the development of upgraded LMR public safety systems. At present, there is virtually no

² See 47 CFR §90.529(b)(1).

³ See 47 CFR §90.529(b)(2).

remaining “general pool” 700 MHz spectrum for central Maryland or available “state” channels for other counties. While Maryland FiRST desires to have counties join the State’s system and utilize Time Division Multiple Access (“TDMA”) or P25 Phase II technology to provide ample capacity for users, counties have the right to construct an independent system exclusive of Maryland FiRST and use any available 700 MHz “general pool” spectrum to augment their communications requirements.

7. The following paragraphs will touch upon the relevant issues of this Petition for Waiver and demonstrate how the request satisfies Section 1.925 of the Commission’s rules for the issuance of a waiver.

UNIQUE ATTRIBUTES OF 700 MHz STATE SPECTRUM

8. In the formation of the nationwide 700 MHz channel plan, the Commission wisely established dedicated frequencies for state government operations. These channels provide unique benefits for state systems by permitting access in multiple counties and regional areas of a state. As a strategy to expand coverage, Maryland FiRST has employed simulcast technology supporting multiple counties as well as special single site repeaters known as Motorola ASTRO Standalone Repeaters or “ASR”s that provide this kind of unique coverage and may augment coverage in as many as four counties.⁴

9. While Maryland FiRST has utilized “general pool” 700 MHz channels with appreciation to Region 20, the use of this spectrum has caused the state system to delimit coverage in some instances to meet the Region 20 contour requirements. In Maryland FiRST cells where there is a combination of state and general pool frequencies,⁵ the State must

⁴ The Mount Airy 700 MHz repeater in Howard County also supports Carroll, Frederick, and Montgomery counties utilizing WPTZ805 “state” channels.

⁵ These counties include Anne Arundel, Calvert, Dorchester, Howard, Prince George’s, Frederick, and Washington.

technically conform all channels within the simulcast cell to the same contour parameters which may limit the level of coverage needed for State multi-county operations. This limitation requiring the integration of general pool and “state” channels obviates the geographical benefits of the “state” 700 MHz channels. Due to a lack of “state” 700 MHz channels, some cells are comprised entirely of Region 20 “general pool spectrum.”⁶

10. While all states must consider contour restrictions at border areas, for many states, and in particular, the geographically larger ones, this is a minimal issue and they thereby enjoy great flexibility with respect to the use of “state” 700 MHz spectrum. Because of Maryland’s unique geographical makeup, neighboring state borders are always an issue of consideration. For example, both the Commonwealths of Pennsylvania and Virginia have wide areas where state government is the complete master of how the entire 700 MHz state spectrum is deployed. Maryland does not enjoy that benefit and as previously stated, through a program of voluntary allotments in border areas, Maryland FiRST only has unfettered access to twenty-four of the ninety-six (P25) “state” 700 MHz channel pairs. Notwithstanding that restriction, Maryland FiRST has worked with neighboring states and somewhere in the State has used every “state” 700 MHz channel pair without interference to another licensee. However and as previously stated, the initial deployments of spectrum have exhausted the availability of “state” 700 MHz spectrum. As Maryland FiRST expands in the future, it is unclear where 700 MHz spectrum will be found that can be used in wide area multi-county State government cells.

11. By this Petition, the State requests that it be permitted to use any authorized frequencies from the reserve pool on a “coordinated” basis with the Washington Metropolitan Area Transit Administration (“WMATA”) which is seeking a similar waiver. This would allow

⁶ Currently, Charles, Montgomery, and Wicomico are based or planned upon the exclusive use of general pool channels.

Maryland FiRST to expand the capacity of cells populated by “state” channels without using “general pool channels” requiring adherence to special intra-county contour requirements found in the Region 20 Plan for 700 MHz. In addition to supporting state government requirements, the State is meeting many requests from federal law enforcement agencies seeking to join Maryland FiRST either for primary operability or interoperability with State law enforcement agencies. As is well known, the I-95 corridor is a major route for unlawful drug and other illegal activities necessitating close interoperability between federal, State, and local law enforcement. The I-95 corridor is also the area where all “state” and “general pool” 700 MHz frequencies have been assigned or planned for new or expanded State or local LMR systems.

REVISION OF THE REGIONAL PLANNING COMMITTEE TWENTY CHANNEL PLAN

12. While the Region 20 Channel Plan could possibly be revised to reassign any available (often referred to as “orphan”) 700 MHz channels into the I-95 corridor area of Maryland, any such effort would not solve Maryland’s immediate needs. Region 20, like all regional planning committees, is comprised of volunteers and would need considerable time to comprehensively revise its channel plan to reassign orphan channels. Maryland, of course, cannot require Region 20 to revise its channel plan.

13. Revising the channel plan, however, would be a substantial challenge for Region 20. The original sortation of channels was conducted on a national basis by the Computer Assisted Pre-coordination Resource and Database System (“CAPRAD”) which compared distances between co and adjacent channel assignments, assessed intermodulation characteristics, and performed other technical calculations to minimize the engineering required by the regional planning committees. However, an automated (CAPRAD-like) tool is not currently available to

re-sort the orphan channels. Any resorting of available channels would have to be made through manual and labor intensive calculations. Even if a revision could be completed in the near future, the revised channel plan will require review and coordination with all of the adjoining regional planning committees (“RPCs”) before the revised channel plan could be submitted to the Commission for review and potential approval. It is anticipated that a comprehensive re-sort of any available channels in Region 20 would be a multi-year process at best.

14. Even if Region 20 revised the channel plan and opened additional spectrum, other users such as the Central Maryland Area Radio Consortium (“CMARC”) are also major users of 700 MHz spectrum and like other governments in central Maryland, could also seek spectrum made available for the area. Continued permitted use of P25 Phase I technology as advocated by CMARC only exacerbates the spectrum challenges in central Maryland. Some of the counties in Maryland are also considering the use of 700 MHz channel pairs for integration within existing 800 MHz systems to expand overall capacity by attempting to blend 700 and 800 MHz frequencies within the same simulcast system due shortages of spectrum.

15. Even with additional general pool spectrum in central Maryland, most Maryland FiRST cells have been developed on a wide area basis and do not conform to the contour rules for Region 20 county systems. To add a general pool channel to a cell configured for multi-county coverage would require either extraordinary action on the part of the Region 20 or a revised and expensive technical redesign of the cell to conform with Region 20 contour rules. The State of Maryland prefers to prioritize funding for expanding Maryland FiRST for public safety use as opposed to consuming precious State funds for redesigning existing cells.

WASHINGTON METROPOLITAN AREA TRANSIT ADMINISTRATION

16. Maryland FiRST is very much aware of the WMATA Petition for Waiver as

submitted (and subsequently amended). As was indicated in Maryland's comments to the *Seventh Report and Order and Notice of Proposed Rule Making*,⁷ the State strongly supports WMATA and recommends that the Commission approve its Petition. When this matter came before Region 20, representatives of Maryland FiRST joined other members in unanimously supporting a Resolution of Support for WMATA. To reiterate, Maryland supports the issuance of sixteen ("16") 700 MHz channels from the reserve pool for the use of WMATA on a multi-state basis which includes Maryland. WMATA is a unique public safety and public service resource and requires a fully interoperable communications system that can operate with all adjoining public safety and law enforcement agencies.

17. If the Maryland Petition is granted, Maryland FiRST pledges to work cooperatively and positively with WMATA in the assignment of 700 MHz frequencies from the pool of reserve channels. However, without frequency coordination, it is possible that in some 700 MHz "reserve" channel assignments, interference could result as the "reserve" channels are often located immediately adjacent to some of the nationwide 700 MHz interoperability channels.⁸ As an important part of Maryland FiRST and in particular its coordination with federal Homeland Security partners, a number of 700 MHz nationwide interoperability channels will be implemented throughout the State. Three of these stations⁹ have already been licensed by the Commission and more are being planned in coordination with federal, State, and local government officials. Two of the interoperability station licenses already approved by the Commission are physically located in areas where operations by WMATA stations would affect the operation of Maryland FiRST.

⁷ See FCC Docket 13-40

⁸ See 47 CFR §90.531(b)(1).

⁹ See WQSJ623, WQSJ624, and WQSJ627.

18. Should the Commission act favorably on the WMATA Petition, Maryland requests that reserve 700 MHz channels not be assigned to WMATA without Maryland FiRST coordination to avoid adjacent channel interference with planned 700 MHz nationwide interoperability channels or potential Maryland FiRST use. Maryland pledges to work with WMATA positively to ensure that it has access to no less than sixteen of the reserve 700 MHz channels in a frequency configuration that mutually approved by WMATA and Maryland as meeting each other's technical requirements.

19. Maryland FiRST will utilize the remaining eight "reserve" channels in the Baltimore-Washington and central/southern Maryland areas¹⁰ where 700 MHz spectrum is unavailable in a manner as to not interfere with WMATA if approved by the Commission. The channels will be used for one of three purposes:

- A. Provide 700 MHz spectrum where insufficient "state" channels are available.
- B. Minimize Region 20 700 MHz channel use to preserve general pool spectrum.
- C. Add capacity to existing Maryland FiRST cells where State channels are used for multi-county wide area coverage.

NATIONAL PUBLIC SAFETY TELECOMMUNICATIONS COUNCIL

20. The National Public Safety Telecommunications Council ("NPSTC") has also advocated a plan to use the reserve 700 MHz channels for deployable nationwide interoperability repeater systems. The State appreciates the fine work that NPSTC and its volunteers perform for public safety. NPSTC was very supportive of Maryland in its endeavor to obtain air-ground 700 MHz frequencies for Maryland State Police helicopters and we remain grateful for that support.

¹⁰ Potential areas where reserve 700 MHz spectrum might be utilized by Maryland FiRST are defined as Anne Arundel County, Baltimore City, Baltimore County, Calvert County, Carroll County, Cecil County, Charles County, Frederick County, Harford County, Howard County, Montgomery County, Prince George's County, St. Mary's County, and Washington County.

21. Notwithstanding the very legitimate request of NPSTC relative to the reserve 700 MHz frequencies, the reality remains that there are unique requirements for the reserve 700 MHz spectrum in the Washington Metropolitan Area for WMATA as well as Maryland FiRST and perhaps others. In Appendix I of this Petition, Maryland FiRST reviews the CAPRAD database for Maryland and documents that, in all but the most distant counties; there are virtually no “state” or general pool frequencies available for system expansion. It is important for the Commission to note that some of the necessity for added capacity is coming from a concentrated area of federal law enforcement use where agencies need wide-area coverage due to the cessation of IWN funding as well as support for Maryland agencies¹¹ affected by the pending termination of the T-Band.

Conclusion

For the foregoing reasons, the State of Maryland respectfully requests that the Commission grant the Petition for Waiver.

Respectfully submitted

State of Maryland

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¹¹ Maryland Transit Administration police.

1. APPENDIX I – AVAILABILITY OF 700 MHz CHANNELS IN MARYLAND

1. Allegany County Cell – All State channels used; three Region 20 frequencies available.
2. Anne Arundel Cell – No additional State or Region 20 frequencies available.
3. Baltimore City - No additional State or Region 20 frequencies available.
4. Baltimore County - No additional State or Region 20 frequencies available.
5. Calvert County – One Region 20 block available.
6. Caroline County – Two Region 20 blocks available.
7. Carroll County - No additional State or Region 20 frequencies available.
8. Cecil County – Two Region 20 blocks available.
9. Charles County - No additional State or Region 20 frequencies available.
10. Dorchester County – One Region 20 frequency available.
11. Frederick County - No additional State or Region 20 frequencies available.
12. Garrett County – Seven Region 20 blocks available.
13. Harford County - No additional State or Region 20 frequencies available.
14. Howard County - No additional State or Region 20 frequencies available.
15. Kent County – Three Region 20 blocks available.
16. Montgomery County – One Region 20 block available.
17. Prince George’s County - No additional State or Region 20 frequencies available.
18. Queen Anne’s County – One Region 20 block available.
19. Somerset County – Eleven Region 20 blocks available.
20. St. Mary’s County – One Region 20 block available.
21. Talbot County – Three Region 20 blocks available.
22. Washington County - No additional State or Region 20 frequencies available.
23. Wicomico County – Eleven Region 20 blocks available.
24. Worcester County – Seven Region 20 blocks available.

APPENDIX II – UTILIZATION OF STATE CHANNELS IN MARYLAND

Channel	Allotment	Allotment	Assigned	Assigned	Assigned
	DC-MD-VA	DE-MD-PA			
23	7TAC51R	Nationwide Interoperability	Annapolis - Greenbury		
24	7TAC51R	Nationwide Interoperability	Annapolis - Greenbury		
25	District of Columbia	State of Delaware	Baltimore Tunnels ASR	Garrett - Simulcast	Conowingo ASR
26	District of Columbia	State of Delaware	Baltimore Tunnels ASR	Garrett - Simulcast	Conowingo ASR
27	COVA or STARS	Commonwealth of Pennsylvania	Matapeake ASR		
28	COVA or STARS	Commonwealth of Pennsylvania	Matapeake ASR		
29	State of Maryland	State of Maryland	Allegany	Baltimore	
30	State of Maryland	State of Maryland	Allegany	Baltimore	
31	COVA or STARS		Kent	Carroll - Westminster ASR	Garrett - Big Savage ASR
32	COVA or STARS		Kent	Carroll - Westminster ASR	Garrett - Big Savage ASR
33	State of Maryland	State of Maryland	Harford	Washington	Somerset-Worcester
34	State of Maryland	State of Maryland	Harford	Washington	Somerset-Worcester
35	District of Columbia		Dorchester	Allegany - Dan's Rock ASR	
36	District of Columbia		Dorchester	Allegany - Dan's Rock ASR	
37	Reserve				
38	Reserve				
61	Reserve				
62	Reserve				
65	District of Columbia	State of Delaware	Lineboro ASR	Garrett - Water Authority ASR	

66	District of Columbia	State of Delaware	Lineboro ASR	Garrett - Water Authority ASR	
67	COVA or STARS	State of Delaware	Howard WT ASR		
68	COVA or STARS	State of Delaware	Howard WT ASR		
69	State of Maryland	State of Maryland	Prince George's - S	Towson ASR	Washington
70	State of Maryland	State of Maryland	Prince George's - S	Towson ASR	Washington
71	COVA or STARS		Cecil		
72	COVA or STARS		Cecil		
73	State of Maryland	State of Maryland	Baltimore	Garrett	Somerset-Worcester
74	State of Maryland	State of Maryland	Baltimore	Garrett	Somerset-Worcester
75	District of Columbia		Kent	Allegany - Westernport ASR	
76	District of Columbia		Kent	Allegany - Westernport ASR	
77	Reserve				
78	Reserve				
101	Air-to-ground	Command and Control	Baltimore - Dundalk	Salisbury - SHA	Lamb's Knoll
102	Air-to-ground	Physician consultation	Baltimore - Dundalk	Salisbury - SHA	Lamb's Knoll
105	District of Columbia	State of Delaware	Towson ASR	Garrett - Big Savage ASR	
106	District of Columbia	State of Delaware	Towson ASR	Garrett - Big Savage ASR	
107	COVA or STARS		Queen Anne's		
108	COVA or STARS		Queen Anne's		
109	State of Maryland	State of Maryland	Cecil	Somerset-Worcester	Gambrill's ASR
110	State of Maryland	State of Maryland	Cecil	Somerset-Worcester	Gambrill's ASR
111	COVA or STARS		Baltimore Tunnels ASR	Allegany - Westernport ASR	

112	COVA or STARS		Baltimore Tunnels ASR	Allegany - Westernport ASR	
113	State of Maryland	Commonwealth of Pennsylvania	Dorchester	Carroll - Westminster ASR	
114	State of Maryland	Commonwealth of Pennsylvania	Dorchester	Carroll - Westminster ASR	
115	District of Columbia	State of Delaware	Conowingo ASR	Baltimore	Allegany - Dan's Rock ASR
116	District of Columbia	State of Delaware	Conowingo ASR	Baltimore	Allegany - Dan's Rock ASR
117	Reserve				
118	Reserve				
119	7TAC55R	Nationwide Interoperability	Bush St - Baltimore		
120	7TAC55R	Nationwide Interoperability	Bush St - Baltimore		
141	Reserve				
142	Reserve				
145	District of Columbia	State of Delaware	Lineboro ASR	Garrett - Water Authority ASR	
146	District of Columbia	State of Delaware	Lineboro ASR	Garrett - Water Authority ASR	
147	COVA or STARS		Harford		
148	COVA or STARS		Harford		
149	State of Maryland	State of Maryland	Prince George's-N	Gambrill's ASR	
150	State of Maryland	State of Maryland	Prince George's-N	Gambrill's ASR	
151	COVA or STARS		Kent	Garrett - Big Savage ASR	
152	COVA or STARS		Kent	Garrett - Big Savage ASR	
153	State of Maryland	Commonwealth of Pennsylvania	Talbot	Lamb's Knoll ASR	
154	State of Maryland	Commonwealth of Pennsylvania	Talbot	Lamb's Knoll ASR	
155	District of	State of	Towson ASR	Allegany -	

	Columbia	Delaware		Dan's Rock ASR	
156	District of Columbia	State of Delaware	Towson ASR	Allegany - Dan's Rock ASR	
157	Reserve				
158	Reserve				
181	Air-to-ground	Command and Control	Baltimore - Dundalk	Salisbury - SHA	Lamb's Knoll
182	Air-to-ground	Physician consultation	Baltimore - Dundalk	Salisbury - SHA	Lamb's Knoll
185	COVA or STARS	State of Delaware	Towson ASR		
186	COVA or STARS	State of Delaware	Towson ASR		
187	State of Maryland	State of Maryland	Allegany	Howard	
188	State of Maryland	State of Maryland	Allegany	Howard	
189	COVA or STARS		Queen Anne's		
190	COVA or STARS		Queen Anne's		
191	State of Maryland	State of Delaware	Calvert	Garrett - Water Authority ASR	Mount Airy ASR
192	State of Maryland	State of Delaware	Calvert	Garrett - Water Authority ASR	Mount Airy ASR
193	COVA or STARS	Commonwealth of Pennsylvania	Howard WT ASR		
194	COVA or STARS	Commonwealth of Pennsylvania	Howard WT ASR		
195	District of Columbia		Talbot	Washington	
196	District of Columbia		Talbot	Washington	
197	Reserve				
198	Reserve				
221	Reserve				
222	Reserve				
225	District of Columbia	State of Delaware	Baltimore Tunnels ASR	Lineboro ASR	Allegany - Westernport ASR

226	District of Columbia	State of Delaware	Baltimore Tunnels ASR	Lineboro ASR	Allegany - Westernport ASR
227	COVA or STARS	Commonwealth of Pennsylvania	Harford		
228	COVA or STARS	Commonwealth of Pennsylvania	Harford		
229	State of Maryland	State of Maryland	Caroline	Carroll - Westminster ASR	Garrett - Simulcast
230	State of Maryland	State of Maryland	Caroline	Carroll - Westminster ASR	Garrett - Simulcast
231	COVA or STARS		Conowingo ASR		
232	COVA or STARS		Conowingo ASR		
233	State of Maryland	State of Maryland	Garrett - Water Authority ASR	Anne Arundel	Gambrill's ASR
234	State of Maryland	State of Maryland	Garrett - Water Authority ASR	Anne Arundel	Gambrill's ASR
235	District of Columbia		Cecil		
236	District of Columbia		Cecil		
237	Reserve	State of Maryland - AACC	COVA or STARS		
238	Reserve	State of Maryland - AACC	COVA or STARS		
263	7TAC54R	Nationwide Interoperability	Lamb's Knoll		
264	7TAC54R	Nationwide Interoperability	Lamb's Knoll		
265	District of Columbia	State of Delaware	Towson ASR		
266	District of Columbia	State of Delaware	Towson ASR		
267	COVA or STARS	Commonwealth of Pennsylvania	Caroline	Howard WT ASR	
268	COVA or STARS	Commonwealth of Pennsylvania	Caroline	Howard WT ASR	
269	State of Maryland	State of Maryland	Allegany	Harford	
270	State of	State of	Allegany	Harford	

	Maryland	Maryland			
271	COVA or STARS		Dorchester		
272	COVA or STARS		Dorchester		
273	State of Maryland	State of Maryland	Kent	Washington	Mount Airy ASR
274	State of Maryland	State of Maryland	Kent	Washington	Mount Airy ASR
275	District of Columbia		Talbot	Lineboro ASR	
276	District of Columbia		Talbot	Lineboro ASR	
277	Reserve				
278	Reserve				
305	COVA or STARS	State of Delaware	Carroll - Westminister ASR	Matapeake ASR	
306	COVA or STARS	State of Delaware	Carroll - Westminister ASR	Matapeake ASR	
307	State of Maryland	Commonwealth of Pennsylvania	Somerset-Worcester	Mount Airy ASR	
308	State of Maryland	Commonwealth of Pennsylvania	Somerset-Worcester	Mount Airy ASR	
309	COVA or STARS		Towson ASR		
310	COVA or STARS		Towson ASR		
311	State of Maryland	State of Maryland	Garrett	Howard	
312	State of Maryland	State of Maryland	Garrett	Howard	
313	COVA or STARS	Commonwealth of Pennsylvania	Caroline		
314	COVA or STARS	Commonwealth of Pennsylvania	Caroline		
315	District of Columbia	State of Delaware	Conowingo ASR		
316	District of Columbia	State of Delaware	Conowingo ASR		
317	Reserve				
318	Reserve				
643	Reserve				
644	Reserve				

645	District of Columbia	State of Delaware	Allegheny - Westernport ASR		
646	District of Columbia	State of Delaware	Allegheny - Westernport ASR		
647	COVA or STARS	Commonwealth of Pennsylvania	Matapeake ASR		
648	COVA or STARS	Commonwealth of Pennsylvania	Matapeake ASR		
649	State of Maryland	State of Maryland	Cecil	Allegheny	Gambrill's ASR
650	State of Maryland	State of Maryland	Cecil	Allegheny	Gambrill's ASR
651	COVA or STARS		Towson ASR		
652	COVA or STARS		Towson ASR		
653	State of Maryland	State of Maryland	Anne Arundel	Garrett	
654	State of Maryland	State of Maryland	Anne Arundel	Garrett	
655	COVA or STARS	Commonwealth of Pennsylvania	Caroline		
656	COVA or STARS	Commonwealth of Pennsylvania	Caroline		
657	7TAC71R	Nationwide Interoperability			
658	7TAC71R	Nationwide Interoperability			
683	Reserve				
684	Reserve				
685	COVA or STARS	Commonwealth of Pennsylvania	Matapeake ASR	Conowingo ASR	
686	COVA or STARS	Commonwealth of Pennsylvania	Matapeake ASR	Conowingo ASR	
687	State of Maryland	State of Maryland	Allegheny - Dan's Rock ASR	Baltimore	
688	State of Maryland	State of Maryland	Allegheny - Dan's Rock ASR	Baltimore	
689	COVA or STARS		Cecil		
690	COVA or STARS		Cecil		
691	State of Maryland	State of Maryland	Caroline	Lamb's Knoll ASR	

692	State of Maryland	State of Maryland	Caroline	Lamb's Knoll ASR	
693	COVA or STARS	Commonwealth of Pennsylvania	Howard WT ASR		
694	COVA or STARS	Commonwealth of Pennsylvania	Howard WT ASR		
695	District of Columbia	State of Delaware	Allegany - Westernport ASR	Lineboro ASR	
696	District of Columbia	State of Delaware	Allegany - Westernport ASR	Lineboro ASR	
699	Reserve				
700	Reserve				
723	Reserve				
724	Reserve				
725	State of Maryland	State of Delaware	Prince George's - N	Allegany - Dan's Rock ASR	Gambrill's ASR
726	State of Maryland	State of Delaware	Prince George's - N	Allegany - Dan's Rock ASR	Gambrill's ASR
727	COVA or STARS	Commonwealth of Pennsylvania	Baltimore Cell		
728	COVA or STARS	Commonwealth of Pennsylvania	Baltimore Cell		
729	State of Maryland	State of Maryland	Lamb's Knoll ASR	Garrett - Water Authority ASR	Queen Anne's
730	State of Maryland	State of Maryland	Lamb's Knoll ASR	Garrett - Water Authority ASR	Queen Anne's
731	COVA or STARS		Towson ASR		
732	COVA or STARS		Towson ASR		
733	State of Maryland	State of Maryland	Allegany - Westernport ASR	Harford	
734	State of Maryland	State of Maryland	Allegany - Westernport ASR	Harford	
735	COVA or STARS	Commonwealth of Pennsylvania	Talbot		
736	COVA or STARS	Commonwealth of Pennsylvania	Talbot		
763	Reserve				
764	Reserve				
765	State of	State of	Allegany	Calvert	Mount Airy

	Maryland	Delaware			ASR
766	State of Maryland	State of Delaware	Allegany	Calvert	Mount Airy ASR
767	COVA or STARS	Commonwealth of Pennsylvania	Kent		
768	COVA or STARS	Commonwealth of Pennsylvania	Kent		
769	State of Maryland	State of Maryland	Baltimore Cell	Washington	
770	State of Maryland	State of Maryland	Baltimore Cell	Washington	
771	COVA or STARS		Caroline		
772	COVA or STARS		Caroline		
773	State of Maryland	State of Maryland	Anne Arundel	Garrett	
774	State of Maryland	State of Maryland	Anne Arundel	Garrett	
775	COVA or STARS	Commonwealth of Pennsylvania	Baltimore Tunnels ASR	Carroll - Westminister ASR	Talbot
776	COVA or STARS	Commonwealth of Pennsylvania	Baltimore Tunnels ASR	Carroll - Westminister ASR	Talbot
779	Reserve				
780	Reserve				
803	Reserve				
804	Reserve				
805	District of Columbia	State of Delaware	Garrett - Simulcast		
806	District of Columbia	State of Delaware	Garrett - Simulcast		
807	COVA or STARS	Commonwealth of Pennsylvania	Mount Airy ASR		
808	COVA or STARS	Commonwealth of Pennsylvania	Mount Airy ASR		
809	State of Maryland	State of Maryland	Cecil	Allegany - Dan's Rock ASR	Howard WT ASR
810	State of Maryland	State of Maryland	Cecil	Allegany - Dan's Rock ASR	Howard WT ASR
811	COVA or STARS		Queen Anne's		
812	COVA or		Queen Anne's		

	STARS				
813	State of Maryland	Commonwealth of Pennsylvania	Lamb's Knoll ASR		
814	State of Maryland	Commonwealth of Pennsylvania	Lamb's Knoll ASR		
815	District of Columbia	State of Delaware	Garrett - Big Savage ASR		
816	District of Columbia	State of Delaware	Garrett - Big Savage ASR		
843	Reserve				
844	Reserve				
845	District of Columbia	State of Delaware	Conowingo ASR		
846	District of Columbia	State of Delaware	Conowingo ASR		
847	COVA or STARS	Commonwealth of Pennsylvania	Matapeake ASR		
848	COVA or STARS	Commonwealth of Pennsylvania	Matapeake ASR		
849	State of Maryland	State of Maryland	Garrett - Simulcast	Baltimore	
850	State of Maryland	State of Maryland	Garrett - Simulcast	Baltimore	
851	COVA or STARS		Kent		
852	COVA or STARS		Kent		
853	State of Maryland	Commonwealth of Pennsylvania	Somerset-Worcester	Lamb's Knoll ASR	
854	State of Maryland	Commonwealth of Pennsylvania	Somerset-Worcester	Lamb's Knoll ASR	
855	District of Columbia	State of Delaware	Baltimore Tunnels ASR	Lineboro ASR	
856	District of Columbia	State of Delaware	Baltimore Tunnels ASR	Lineboro ASR	
859	Reserve				
860	Reserve				
883	Reserve				
884	Reserve				
885	District of Columbia		Allegany	Dorchester	

886	District of Columbia		Allegheny	Dorchester	
887	COVA or STARS		Queen Anne's	Carroll - Westminster ASR	
888	COVA or STARS		Queen Anne's	Carroll - Westminster ASR	
889	State of Maryland	Commonwealth of Pennsylvania	Prince George's - S		
890	State of Maryland	Commonwealth of Pennsylvania	Prince George's - S		
891	COVA or STARS		Matapeake ASR		
892	COVA or STARS		Matapeake ASR		
893	State of Maryland	State of Maryland	Washington	Baltimore Cell	
894	State of Maryland	State of Maryland	Washington	Baltimore Cell	
895	District of Columbia	State of Delaware	Garrett - Big Savage ASR		
896	District of Columbia	State of Delaware	Garrett - Big Savage ASR		
923	Reserve				
924	Reserve				
925	State of Maryland	State of Delaware	Allegheny	Anne Arundel	Gambrill's ASR
926	State of Maryland	State of Delaware	Allegheny	Anne Arundel	Gambrill's ASR
927	District of Columbia	Commonwealth of Pennsylvania	Somerset-Worcester		
928	District of Columbia	Commonwealth of Pennsylvania	Somerset-Worcester		
929	State of Maryland	State of Maryland	Garrett - Simulcast	Queen Anne's	Mount Airy ASR
930	State of Maryland	State of Maryland	Garrett - Simulcast	Queen Anne's	Mount Airy ASR
931	COVA or STARS		Harford		
932	COVA or STARS		Harford		
933	State of Maryland	Commonwealth of Pennsylvania	Talbot	Lamb's Knoll ASR	
934	State of Maryland	Commonwealth of Pennsylvania	Talbot	Lamb's Knoll ASR	

935	District of Columbia	State of Delaware	Baltimore Tunnels ASR	Allegany - Dan's Rock ASR	
936	District of Columbia	State of Delaware	Baltimore Tunnels ASR	Allegany - Dan's Rock ASR	
937	Reserve				
938	Reserve				