

VERNER · LIIPFERT
BERNHARD · MCPHERSON ^{BY} HAND EX PARTE OR LATE FILED
CHARTERED

901 - 15TH STREET, N.W.
WASHINGTON, D.C. 20005-2301
(202) 371-6000
FAX: (202) 371-6279

September 3, 1998

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SEP - 3 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Magalie Roman Salas, Esq.
Secretary
Federal Communications Commission
1919 M Street, NW
Room 222
Washington, DC 20554

RE: Washington, DC Metropolitan Area Regional Public Safety Plan (Region-20), Philadelphia Metropolitan Area Regional Public Safety Plan (Region-28), GN Docket Nos. 90-7 and 89-573

Dear Ms. Salas:

Enclosed herewith, on behalf of the Commonwealth of Pennsylvania, are an original and four copies of an Opposition to Written Ex Parte Presentation: Response Statement in the above-captioned proceeding.

This pleading is filed in response to a Written Ex Parte Presentation: Response Statement filed by the Region-20 Public Safety Review Committee which requested "unconditional" approval of Region-20's November 25, 1994 amendment to its regional plan.

Please direct any questions regarding this matter to the undersigned.

Sincerely,


Lisa M. Higginbotham

Enclosures

cc: See Certificate of Service

No. of Copies rec'd _____
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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

SEP - 3 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Washington, DC Metropolitan Area)	GN Docket No. 90-7
Regional Public Safety Plan)	
(Region-20))	
)	
Philadelphia Metropolitan Area)	GN Docket No. 89-573
Regional Public Safety Plan)	
(Region-28))	

COMMONWEALTH OF PENNSYLVANIA
OPPOSITION TO WRITTEN EX PARTE PRESENTATION:
RESPONSE STATEMENT

Thomas J. Keller
Lisa M. Higginbotham
VERNER, LIIPFERT, BERNHARD
McPHERSON & HAND, CHTD.
901-15th Street, NW
Suite 700
Washington, DC 20005
(202) 371-6000

Its Attorneys

September 3, 1998

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SUMMARY

The Commonwealth opposes "unconditional" approval of Region-20's plan amendment, including the "Inter-Regional Coordination Procedures Agreement" entered into by Region-20 and Region-28. As discussed below, the Commonwealth is primarily concerned with the continued failure of the regional planning process to resolve interference issues caused by Region-20's improper coordination and the Commission's improper grant of licenses to Carroll County, Maryland, allowing Carroll County to operate on nine channels subject to Region-20's plan amendment -- an amendment which, at the time the licenses were granted, had not been approved by the Commission. As a result of this erroneous grant, the Commonwealth now faces interference to its public safety communications system from Carroll County's operations on these channels.

The Commonwealth requests that the Commission reject Region-20's amendment in light of the continued threat the Carroll County assignments present to the Commonwealth's system, Region-20's and Region-28's apparent intention not to resolve this issue in the near future, and Region-20's prior lack of cooperation in resolving this issue. In addition, the Commonwealth urges the Commission to resolve this interference issue itself by modifying Carroll County's licenses so as not to cause interference to the Commonwealth's system. Alternatively, the Commission should revoke Carroll County's licenses pursuant to 47 U.S.C. § 312. In any event, the Commission should not grant "unconditional" approval of Region-20's amendment until the interference issue is resolved.

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
)	
Washington, DC Metropolitan Area)	GN Docket No. 90-7
Regional Public Safety Plan)	
(Region-20))	
)	
Philadelphia Metropolitan Area)	GN Docket No. 89-573
Regional Public Safety Plan)	
(Region-28))	

**COMMONWEALTH OF PENNSYLVANIA
OPPOSITION TO WRITTEN EX PARTE PRESENTATION:
RESPONSE STATEMENT**

The Commonwealth of Pennsylvania (hereinafter, the "Commonwealth"), through its attorneys, hereby files this Opposition to Region-20 Public Safety Review Committee's (hereinafter, "Region-20") Written Ex Parte Presentation: Response Statement (hereinafter, "Response Statement") filed with the Commission on August 21, 1998. In its Response Statement, Region-20 requested that the Commission "unconditionally" approve proposed modifications to its regional plan, including the incorporation of an Inter-Regional Coordination Procedures Agreement (hereinafter, the "Agreement") between Region-20 and the Region-28 Public Safety Planning Update Committee (hereinafter "Region-28"). For the reasons discussed below, the Commonwealth opposes acceptance of the Agreement and strongly urges the Commission not to grant unconditional approval of Region-20's proposed amendment to its regional plan.

I. INTRODUCTION AND STATEMENT OF INTEREST

The Commonwealth is the licensee of a public safety communications system which utilizes, inter alia, conventional and trunked 800 MHZ channels assigned by the Commission upon recommendation of the Region-28 and Region-36 Planning Committees in accordance with the Commission's rules governing the implementation of the Public Safety National Plan. The Commonwealth has been an active participant in this proceeding, particularly given the direct impact Region-20's proposed frequency changes would have on the Commonwealth's system.

The Commonwealth's primary objection centers around the continued failure of the regional planning process to resolve interference issues caused by the Commission's improper grant of licenses to Carroll County, Maryland (hereinafter, "Carroll County") allowing it to operate on nine of the channels proposed to be added to Region-20's plan by its November 25, 1994 amendment -- an amendment which **had not** been approved by the Commission at the time Carroll County filed its applications for these channels or at the time the Commission granted Carroll County's applications. Because of this erroneous grant, the Commonwealth now faces interference to its communications system from Carroll County's operations on these channels.

This problem is exacerbated by Region-20's refusal to resolve this issue, despite the passage of almost two years since the Commission recognized the defective licensing of these channels and numerous clarifications by the Commission that the interference problems caused by Carroll County's operations were, in fact, issues properly raised for discussion in this proceeding.

The Commonwealth has no choice but to strongly urge the Commission to reject Region-20's proposed amendment to its regional plan in light of (1) the continued threat that these assignments present to the Commonwealth's public safety communications system, (2) Region-20's and Region-28's apparent decision to avoid resolution of this issue, and (3) Region-20's failure to cooperate in resolution of this issue in the past. Moreover, given Region-20's lack of cooperation regarding this issue throughout this proceeding, the Commonwealth has no reason to believe that Region-20 will ever be inclined to engage in serious resolution of this issue. Indeed, Region-20's repeated emphasis that the Commission grant "unconditional"¹ acceptance of its amendment appears to be designed specifically to allow Region-20 to walk away from this problem -- which it created -- unscathed.

Accordingly, the Commonwealth urges the Commission to resolve this issue itself by modifying, on its own motion, Carroll County's licenses to require it to operate on different frequencies (or on the same frequencies but with reduced power) so as not to cause interference to the Commonwealth's system. In any event, under no circumstances should the Commission grant "unconditional" approval of Region-20's amendment at this time, because doing so would render the Commonwealth's system subject to continued interference from the improper operations of Carroll County's

¹ In its four-page pleading (excluding the certificate of service and attachments), Region-20 states no less than four times that the acceptance should be "unconditional") and each time Region-20 underscores the term "unconditional." See Response Statement, at pages 3-4, ¶¶ 4, 5, 6, and 7. It is apparent from its emphasized and frequent use of the term that Region-20 has a not-so-hidden agenda here, namely, to avoid altogether any responsibility for resolving the interference problem that was created as a result of the Carroll County licenses.

system. To require the Commonwealth to shoulder all of the burden in this case clearly would be unfair and would not serve the public interest, particularly given the Commonwealth's lack of wrongdoing in this matter and Region-20's questionable handling of this problem throughout this proceeding.

II. **BACKGROUND**

On November 25, 1994, Region-20 submitted an amendment to its regional plan in which it proposed changes to its frequency matrix to reflect assignments made as a result of its second filing window. Several parties, including the Commonwealth, opposed the proposed amendment on numerous grounds including, *inter alia*, Region-20's failure to coordinate its proposed amendment with surrounding regions and potential interference to existing or planned systems in adjacent regions.²

In their decision conditionally accepting Region-20's amendment, the Office of Engineering & Technology (OET) and the Private Wireless Division (hereinafter, the "Division") found that Region-20 had, in fact, failed to effectively coordinate its amendment with adjacent regions.³ In addition, OET and the Division raised concerns regarding the improper assignment of channels subject to the Region-20 plan amendment prior to Commission acceptance of the amendment.⁴ In this regard, OET

² In the Matter of Washington DC Metropolitan Area Regional Public Safety Plan (Region-20) Philadelphia Metropolitan Area Regional Public Safety Plan (Region-28), Gen Docket Nos. 90-7 and 89-573, Order, 11 FCC Rcd 21510 (1996) ("Region-20 Order").

³ Region-20 Order, 11 FCC Rcd at 21517-21519.

⁴ Id., 11 FCC Rcd at 21519.

and the Division noted that Carroll County's licenses were among those issued prior to Commission approval of the amendment.⁵ To correct these deficiencies, OET and the Division ordered Region-20 to establish satisfactory inter-region coordination procedures with Region-28.⁶

Region-20's behavior during this proceeding can be characterized as "less than cooperative" at best. Throughout the negotiations, Region-20 refused to discuss key interference issues arising from the improper issuance of licenses to Carroll County. Region-20's failure to even discuss this issue led the Commission on more than one occasion to clarify that the interference issues surrounding the improper licensing of channels to Carroll County without required prior Commission approval of Region-20's plan amendment raised "serious questions" requiring resolution.⁷

Despite the passage of almost two years since the Commission ordered Region-20 to address and resolve this issue, the interference problem surrounding Carroll County's improper operations and their effect on the Commonwealth's public safety communications system remains unresolved. As a result, the Commonwealth continues to face interference from Carroll County's operations on these channels.

⁵ Id.

⁶ Id., 11 FCC Rcd at 21517.

⁷ See Letter from D'wana R. Terry, Chief Public Safety and Private Wireless Division to Stephen H. Souder and Richard R. Reynolds dated April 16, 1998 (hereinafter, the "April 16, 1998 Letter"); Letter from David E. Horowitz, Chief, Private Wireless Division to Steve Souder and Richard Reynolds dated March 24, 1997 (hereinafter, the "March 24, 1997 Letter").

III. DISCUSSION

A. **The Commonwealth Clearly Has Standing To File This Opposition.**

The Commonwealth has standing to file this opposition to Region-20's Response Statement. As the Division acknowledged previously, the issue of Carroll County's improper operations on channels proposed to be added to Region-20's plan is properly raised in this proceeding "until the Region 20 amendment . . . is fully accepted by the Commission."⁸ Moreover, as the Division stated previously, "[a]ny opposition to the agreement by any party, particularly parties of record to this proceeding, would render the conditional approval of the Region 20 amendment subject to additional review and possible dismissal."⁹ As a party of record in this proceeding and as the party which is most directly affected by Carroll County's operations on these nine channels, the Commonwealth clearly has standing to oppose Region-20's request for unconditional approval of its Agreement with Region-28 and "unconditional" acceptance of Region-20's proposed amendment.

B. **The Issuance of Licenses to Carroll County Was Procedurally and Substantively Defective.**

1. Carroll County's Licenses Were Improperly Granted Prior to Commission Approval of the Region-20 Plan Amendment.

The Commission's grant of licenses to Carroll County to operate on nine of the channels subject to the Region-20 plan amendment was improper. By application dated August 10, 1995 (File Nos. 001664 and 001665), Carroll County sought

⁸ March 24, 1997 Letter at 2.

⁹ Id., at 3 (emphasis added). See also April 16, 1998 Letter at 3.

Commission consent to construct and operate mobile radio stations on nine channels: Channel Nos. 686, 690, 693, 706, 709, 711, 713, 720 and 748. Those nine channels represented a change in the frequency matrix of the Region-20 plan (which includes Carroll County) and were the subject, inter alia, of Region-20's amendment to its regional plan. The Commission issued a license to Carroll County on November 2, 1995, for call sign WPIQ515, and on December 13, 1995, for call sign WPIU695. These call signs together covered the nine channels described above.

Carroll County's licenses were applied for and granted by the Commission prior to the Commission's approval of Region-20's plan amendment. Indeed, OET and the Division previously acknowledged this fact when they specifically recognized in their Region-20 Order that Carroll County's licenses, among others, had been improperly applied for and granted in violation of the requirement that "all assignments within the 821-824/866-869 MHZ bands must be made in conformance with regional plans and amendments thereto only after they are approved by the Commission, and licensing of stations on the basis of a proposed amendment is not permitted."¹⁰ In light of this, it is absolutely clear that Carroll County's licenses were improperly applied for by Carroll County and improperly granted by the Commission.

2. The Frequency Coordination Relied Upon By Carroll County In Applying For the Licenses Was Invalid.

In addition to being filed prematurely, Carroll County's applications also failed to include a valid frequency coordination and, therefore, should not have been granted.

¹⁰ Region-20 Order, 11 FCC Rcd at 21519 (emphasis added).

By letter dated April 29, 1994, APCO and Region-20 officially notified Carroll County of frequency coordination for its applications, stating that, "[t]his coordination is valid for a period of (6) months from the above date."¹¹ This coordination notice was attached to the applications filed by Carroll County in August 1995, more than one year from the date of the coordination letter.¹² Because the frequency coordination relied upon by Carroll County was, by its own terms, no longer valid at the time its applications were filed, Carroll County's applications were not supported by a valid frequency coordination and, consequently, should not have been granted.

3. Carroll County's Proposed Operations Were Inconsistent With The Terms of The Region-20 Plan Amendment.

In addition to its procedural defects, Carroll County's licensed operations do not comply with Region-20's plan amendment pursuant to which the nine channels were assigned. Under the proposed Region-20 plan amendment, all Region-20 applicants would have been required to "engineer their systems such that their 5 dBu (for co-channel interference protection) and 25 dBu (adjacent channel protection) contours do not extend beyond Region 20's boundaries."¹³ Where an applicant's contours require

¹¹ Letter from Jon Bigony, APCO, Steve Souder, Region-20 and W. Van Aller, Region-20 to Howard Redman, Carroll County Emergency Communications dated April 29, 1994 (hereinafter, "April 29, 1994 Letter") (emphasis added). See Exhibit 1

¹² See Exhibit 2.

¹³ Region-20 Amendment filed November 25, 1994, at page 27. OET and the Division characterized this portion of the Region-20 plan as an attempt to "create an island" whereby Region-20 assignments would be configured to limit the potential interference to stations in adjacent regions. Region-20 Order, 11 FCC Rcd at 21518-21519.

extension beyond a Region-20 boundary, Region-20 "will secure the concurrence of the affected region(s) prior to approving the application."¹⁴

Neither Carroll County's proposed operation nor Region-20's processing of the proposal complied with the express language of this provision of Region-20's plan amendment. As demonstrated by the contour maps for Carroll County's stations, Carroll County's signal contours exceeded far beyond the northern border of Carroll County (which is also the Region 20-boundary) into Regions-28 and 36. Thus, Carroll County's operations were clearly beyond the threshold parameters set forth in the Region-20 plan amendment. Despite this and the obvious conflict with the Commonwealth's frequency assignments, Region-20 failed to obtain any concurrences from Pennsylvania regional planning committees prior to approving Carroll County's applications. Indeed, Region-20 and APCO representatives admitted this omission in their official notification of frequency coordination to Carroll County. "[W]e do not yet have confirmation from the Pennsylvania regional committees that this assignment table is acceptable to them."¹⁵ Accordingly, as demonstrated above, Region-20, APCO, Carroll County, and the Commission all acted improperly in coordinating, applying for, and granting licenses to Carroll County to operate on these nine channels.

¹⁴ Region-20 Amendment filed November 25, 1994, at page 27.

¹⁵ April 29, 1994 Letter.

C. The Commission Must Correct These Deficiencies Prior To Granting Unconditional Approval of Region-20's Plan Amendment.

1. The Time Is Ripe For Commission Resolution of This Issue.

Although almost two years have elapsed since the Region-20 Order, Regions-20 and 28 have still not resolved this issue and instead have chosen to enter into the Agreement. Under the circumstances, the Commonwealth respectfully submits that the Commission should resolve this issue prior to any unconditional approval of Region-20's plan amendment. As noted above, given the history of the proceeding, the Commonwealth has no basis to believe that Region-20 will ever be inclined to resolve this issue unless forced to do so by the Commission. Indeed, there is every indication that an "unconditional" approval of this amendment, as requested by Region-20, would only strengthen Region-20's resolve to walk away from this issue, leaving the Commonwealth to carry the burden of resolving an interference problem that someone else created. Moreover, because the two regional planning committees have had almost two years to resolve this issue through negotiation, to no avail, the Commonwealth believes that the time is clearly ripe for Commission resolution of this issue.

In light of the foregoing, the Commonwealth urges the Commission to modify Carroll County's licenses so as to eliminate the interference problem resulting from the conflict with the Commonwealth's frequency assignments. Such action clearly is permissible under Section 316 of the Communications Act,¹⁶ and would be consistent

¹⁶ 47 U.S.C. § 316.

with recent Commission precedent for modifying licenses to address interference issues.¹⁷

Alternatively, the Commission should commence proceedings to revoke Carroll County's licenses as authorized by Section 312 of the Communications Act.¹⁸ As demonstrated above, Carroll County's licenses were improperly granted because there was no prior Commission approval of the regional plan amendment pursuant to which the channels were being assigned, and there was no valid frequency coordination in support of the licensee's applications. These deficiencies certainly constitute "conditions coming to the attention of the Commission which would warrant it in refusing to grant a license or permit on an original application."¹⁹ Accordingly, the Commission should commence revocation proceedings against Carroll County's licenses.

In any event, the Commonwealth urges the Commission not to grant "unconditional" approval of Region-20's plan amendment unless and until Carroll County's frequency conflict with the Commonwealth has been fully resolved.

¹⁷ See e.g., Amendment of the Commission's Rules to Relocate the Digital Electronic Message Service From the 18 GHz to the 24 GHz Band and to Allocate the 24 GHz Band for Fixed Services, ET Docket No. 97-99, Order, 12 FCC Rcd 3471 (1997), affirmed on reconsideration, Memorandum Opinion and Order, FCC 98-155 (released: July 17, 1998).

¹⁸ 47 U.S.C. § 312.

¹⁹ 47 U.S.C. § 312(a)(2).

2. Requiring Region-20 and Carroll County to Carry the Burden of Resolving This Issue Serves the Public Interest Since Neither Party Can Be Held Blameless For the Improper Issuance Of Licenses.

Neither Region-20 nor Carroll County can be held blameless for the improper issuance of licenses in this case. As the evidence clearly demonstrates, both parties were well aware of the above-noted deficiencies with respect to Carroll County's license applications for the nine channels. First, Region-20 clearly knew at the time it coordinated Carroll County's applications for these nine channels that its plan amendment had not yet been approved by the Commission.

Second, Carroll County was well aware, at the time it submitted its applications, that its supporting frequency coordination had expired. As shown above, the April 29, 1994 Letter clearly stated that frequency coordination was valid for only six months from the date of the letter. Thus, the frequency coordination expired, by its terms, on October 29, 1994, but Carroll County's applications were not filed until almost a year later in August 1995.

Finally, as Region-20 representatives admitted in their April 29, 1994 Letter to Carroll County, Region-20 had not obtained the required concurrences from the adjacent Pennsylvania regional planning committees "that this assignment table is acceptable to them"²⁰ at the time it coordinated the Carroll County's applications. Thus, both Region-20 and Carroll County were clearly on notice that Region-20's approval of the assignment of the nine channels to the County was inconsistent with Region-20's

²⁰ See April 29, 1994 Letter.

own plan amendment. Indeed, the Region-20 representatives acknowledged that the absence of such concurrences created a "risk factor" for Carroll County.²¹ Thus, both parties were well aware that approval of Carroll County's applications was inconsistent with the proposed Region-20 plan amendment and that such inconsistency carried with it the risk of a frequency conflict with a licensee in a neighboring region. Having specifically acknowledged and assumed that risk, Region-20 and Carroll County must now bear the consequences.

IV. CONCLUSION

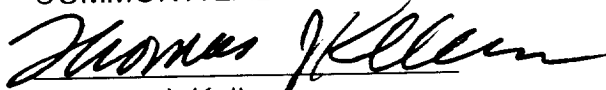
After almost two years of negotiation, the issue of the improper grant of Carroll County's licenses and the resulting interference to the Commonwealth's public safety communications system remains unresolved. The proposed agreement provides no assurance that Regions-20 and 28 will, in fact, resolve this issue. Indeed, "unconditional" approval of the Agreement, together with approval of Region-20's plan amendment, will foreclose resolution of this issue at the regional planning committee level. Accordingly, the Commission should reject Region-20's plan amendment, including the agreement between Regions-20 and 28. Furthermore, the Commission should finally resolve this issue itself by either modifying Carroll County's licenses to avoid interference with the Commonwealth's system, or by revoking the licenses as erroneous granted. In any event, the Commission must resolve this interference issue prior to granting "unconditional" approval of the Region-20 plan amendment. To do

²¹ Id.

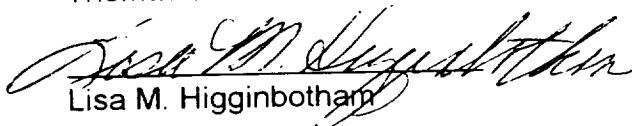
otherwise would unfairly require the Commonwealth to shoulder the burden of an interference problem it did not create.

Respectfully submitted,

COMMONWEALTH OF PENNSYLVANIA



Thomas J. Keller



Lisa M. Higginbotham

VERNER, LIIPFERT, BERNHARD
McPHERSON & HAND, CHTD.

901-15th Street, NW
Suite 700
Washington, DC 2005
(202) 371-6060

Its Attorneys

September 3, 1998

Exhibit 1: Copy of Region-20 Coordination Letter, April 24, 1994.

Exhibit 2: Copies of two Carroll County Applications, FCC Form 600, August 10, 1994.

EXHIBIT 1

**Public Safety Radio Communications Plan
Region 20 *
Maryland, Washington, D.C. and Northern Virginia
Regional Plan Review Committee**

Mailing Address:

Howard S. Redman, Jr. (RPRC Secretary)
Carroll County (MD) Emergency Manager
1345 Washington Road
Westminster, MD 21157
VOICE: 410-848-1488
FAX: 410-848-3794

RPRC Chairman:

Steve Souder
Administrator
Arlington County, Virginia
Emergency Communications Center
2100 North 15th Street
Arlington, VA 22201
VOICE: 703-358-4000
FAX: 703-358-3989



April 29, 1994

Mr. Howard Redman
Carroll County Emergency Communications
1345 Washington Rd.
Westminster MD 21157

Dear Buddy:

I regret the long delay in confirming the Region 20 award of (9) NPSPAC 821 MHz channels to Carroll County from our initial notification of last September, but the necessary intermediate FCC plan modification took longer than expected. Also, the Region 20 Technical Committee has had to integrate the Window One frequency matrix modifications into the Plan while correcting several typo errors.

The list of (9) NPSPAC frequencies being assigned to Carroll County is attached to this letter. While we do not yet have confirmation from the Pennsylvania regional committees that this assignment table is acceptable to them, the risk factor there is very small as we know of little or no 821MHz system construction activity anywhere within range of your proposed system.

This letter will serve as official notification of frequency coordination to Carroll County, and should be attached to your revised FCC 574 forms when transmitted to the APCO coordination office. Please send us a copy of said 574's when they are submitted. This coordination is valid for a period of (6) months from the above date.

Concur:

Sincerely,

Jon Bigony
Jon Bigony, APCO
Coordinator MD/DC

Steve Souder
Steve Souder, Chmn.
Region 20

W. Van Aller
W. Van Aller
for Region 20

EXHIBIT 2

FCC 600 Main Form FEDERAL COMMUNICATIONS COMMISSION Application for Mobile Radio Service Authorization or Rural Radiotelephone Service Authorization	<small>Approved by Order 1289-0229 Expires 1/31/97 Int. Reg. Bureau Record Per Response, 3 Wks.</small>	FCC Use Only (File Number) <div style="font-size: 2em; text-align: center;">001664</div>
	FEE Use Only <div style="text-align: right; font-weight: bold;">WPIU695</div>	

FILING FEE

(a) Fee Type Code	(b) Fee Multiple	(c) Fee Due for Fee Type Code in (a)	(d) Total Amount Due	FEE Use Only
			\$	

APPLICANT

AR "F" 12-13 95

#12 sp. cd.

1. Legal Name of Applicant Carroll, County of	2. Voice Telephone Number (410) 848-6717
3. Assumed Name Used for Doing Business (if any)	4. Fax Telephone Number ()
5. Mailing Street Address or P.O. Box 225 N. Center Street ATTENTION: Howard S. Redman, Jr.	
6. City Westminster	7. State: MD 8. Zip Code: 21157
9. Name of Contact Representative (if other than applicant) Eric Larsen (Susan Colgan)	10. Voice Telephone Number (410) 712-6286
11. Firm or Company Name Motorola Inc.	12. Fax Telephone Number (410) 712-6244
13. Mailing Street Address or P.O. Box 7230 Parkway Drive	
14. City Hanover	15. State: MD 16. Zip Code: 21157

CLASSIFICATION OF FILING

17. This filing is a (an) <input checked="" type="checkbox"/> N <u>New application</u> <u>Amendment to a pending application</u>	
18. Does the applicant believe that this filing should be classified as MINOR under 47 U.S.C. § 309? <input checked="" type="checkbox"/> D <u>Yes</u> <u>No</u> <u>Does not apply</u>	
19. If not minor under 47 U.S.C. § 309, classification for purposes of competitive bidding: <input type="checkbox"/> Initial <u>Modification</u> <u>Renewal</u>	
20. If this filing is in reference to an existing station: Cell sign of existing station:	21. If this filing is an amendment to a pending application: File number of pending application: Date Filed:

NATURE OF SERVICE

22. This filing is for authorization to provide or use the following type(s) of radio service: <input checked="" type="checkbox"/> P <u>Commercial mobile</u> <u>Private mobile</u> <u>Both commercial and private mobile</u> <u>Fixed</u>	
23. Users are or will be: <input checked="" type="checkbox"/> I <u>Public subscribers</u> <u>Eligibles</u> <u>Internal</u>	24. Status: <input checked="" type="checkbox"/> N <u>Profit</u> <u>Not for profit</u>
25. Interconnected service? <input checked="" type="checkbox"/> Y <u>Yes</u> <u>No</u>	26. Radio Service code: <input checked="" type="checkbox"/> YP
27. Type of operation code: <input type="checkbox"/>	

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant environmental effect as defined by 47 CFR 1.13077 • If "yes", attach environmental assessment as required by 47 CFR 1.1308 and 47 CFR 1.1311	[N] <u>Yes</u> No
--	---------------------

ALIEN OWNERSHIP

29. Is the applicant a foreign government or the representative of any foreign government?	[N] <u>Yes</u> No
30. Is the applicant an alien or the representative of an alien?	[N] <u>Yes</u> No
31. Is the applicant a corporation organized under the laws of any foreign government?	[N] <u>Yes</u> No
32. Is the applicant a corporation of which any officer or director is an alien or of which more than one-fifth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign representative thereof or by any corporation organized under the laws of a foreign country?	[N] <u>Yes</u> No
33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which any officer or more than one-fourth of the directors are aliens, or of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country? • If "yes", attach exhibit explaining nature and extent of alien or foreign ownership or control.	[N] <u>Yes</u> No

BASIC QUALIFICATIONS

34. Has the applicant or any party to this application or amendment had any FCC station authorization, license or construction permit revoked or had any application for an initial, modification or renewal of FCC station authorization, license, construction permit denied by the Commission? • If "yes", attach exhibit explaining circumstances.	[N] <u>Yes</u> No
35. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court?	[N] <u>Yes</u> No
36. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition?	[N] <u>Yes</u> No
37. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items?	[N] <u>Yes</u> No
38. Does the undersigned certify (by responding "Y" to this question), that neither the applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 852, because of a conviction for possession or distribution of a controlled substance? • See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.	[Y] <u>Yes</u> No

CERTIFICATION

SEP 20 1995

The APPLICANT waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

39. Applicant is a (an) [G] Individual Unincorporated Association Partnership Corporation Governmental Entity

40. Typed Name of Person Signing: Howard S. Redman Jr. 41. Title: Administrator of Public-Safety

42. Signature: *Howard S. Redman Jr.* 43. Date: 8-10-95

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(2)(1)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

WIRELESS
2 OCT 95

FCC 600 FEDERAL COMMUNICATIONS COMMISSION SCHEDULE D Administrative Data <small>(all services except those for which Schedule A is required)</small>	<small>Approved by OMB 1988-0873 Expires 10/31/97 Est. Orig. Budget Hours Per Response: 4 hrs</small>
	FCC Use Only

Licensee Name <i>Carroll, County of</i>	Radio Service YF	Call Sign or Station Location (City, State) Westminster, MD
---	----------------------------	---

PURPOSE OF FILING

D1. The purpose of this filing is to: <input checked="" type="checkbox"/> N request a new station license. <input type="checkbox"/> M modify an existing licensed station(s). <input type="checkbox"/> R renew an existing licensed station. <input type="checkbox"/> X reinstates an expired call sign. <input type="checkbox"/> A assign an existing license.	D2. If system licensing, list call signs of stations to be combined. (First call sign will be retained.)
--	--

D3. Specify proposed modifications, if any:

ASSOCIATED CALL SIGNS

D4. Call signs:

RADIO SYSTEM OPERATION POINT OF CONTACT

D5. Street Address, City, State 225 N. Center Street Westminster, MD	D6. Voice Telephone Number (410) 848-6717
--	---

ASSOCIATED BROADCAST STATION

D7. Call Sign	D8. City	D9. State
----------------------	-----------------	------------------

MARKET AREA

D10. Market Area / Number

PAGING OPERATIONS

D11. Number of Paging Receivers

ELIGIBILITY

D12. Describe Activity Applicant is the Carroll County Maryland. The radios will be used for official governmental business activities.	D13. Rule Section 90.17(a)
---	--------------------------------------

D14. Frequency Coordination Number [5314001075]

FOR FREQUENCY COORDINATOR'S USE ONLY

APPROVED APCO NATIONAL PLAN

Durham Date: *9-20-95*

FCC 600	FEDERAL COMMUNICATIONS COMMISSION SCHEDULE E Station Location Data <small>(all services except those for which Schedule A is required)</small>	Approved by OMB 388-0223 Expires 10/31/97 Est. Reg. Section Hours Per Response 4 hrs.
		FCC Use Only

Licensee Name <i>DD</i> Carroll, County of	Radio Service YF	Call Sign or Station Location (City, State) Westminster, MD
---	---------------------	--

E1. Specify the datum used to determine all coordinates on this filing: [2] NAD27 NAD83 Other (Specify _____)

FIXED OR PERMANENT LOCATIONS

LOC	E2. Station Address / Geographic Location	E3. City	E4. County	E5. State
A	Louisville Road	Westminster	Carroll	MD
B	Mayberry Road	Mayberry <i>with West</i>	Carroll	MD
C	Marston Road	Taylorville " "	Carroll	MD
D	Penn Shop Road	Mount Airy	Carroll	MD
<i>DD</i> E	Hanover Road <i>30 miles N. of Rt. 482</i>	Rampstead <i>with West</i>	Carroll	MD
F	Gorsuch Road	Westminster	Carroll	MD

LOC	E6. Latitude (degrees, minutes, seconds)	E7. Longitude (degrees, minutes, seconds)	E8. Ground Elevation (meters)
A	39 27 43	76 54 40 39	176
B	39 38 35	77 05 41	171
C	39 28 50	77 04 36	245
D	39 20 50	77 10 18	266
E	39 36 59	76 51 37	267
F	39 34 22	76 58 18	291

CONTROLS MEETING THE 20 FOOT CRITERIA, MOBILE OR TEMPORARY LOCATIONS

LOC	E9. Radius (km)	E10. Area of Operation Code	E11.		COUNTY	STATE	E12 Operations (S) South of Line A and/or (W) West of Line C
			LATITUDE	LONGITUDE			
<i>DD</i> G	32	F	39 34 22	76 58 18	Carroll	MD	
<i>DD</i> H		8	-	-		MD	
			-	-			
			-	-			
			-	-			

FCC 600	FEDERAL COMMUNICATIONS COMMISSION SCHEDULE F Antenna Structure Data (All Services)	<small>Approved by OMB 1002-0020 Expires 10/31/97 Est. Avg. Burden Hours Per Response: 6.100</small>
		FCC Use Only

License Name Carroll, County OF	Radio Service YF	Call Sign or Station Location (City, State) Westminster, MD
---	----------------------------	---

STATUS AND IDENTIFYING INFORMATION

LOC	F1. Location Number	F2. New or Existing	F3. Call Sign of Existing Station	F4. Radio Service	F5. Tower Owner's Name and Telephone Number
A		N			Cellular One (410) 712-7715
B		N			Bell Atlantic (410) 719-5198
C		N			Bell Atlantic (410) 719-5198
D		N			University of Maryland ()
E		N			Shamrock Communications (WGRX) (310) 435-9487
F		N			Bell Atlantic (410) 719-5198

STRUCTURE TYPE AND HEIGHT

LOC	F8. Figure Number (see reverse)	F7. Structure Type	F9. Height of Support Structure (b) (meters)	F9. Overall Height of Structure (d) (meters)	F10. FCC Tower Number
A	3	Tower	96	96 <i>64 side</i>	
B	3	Tower	80	80 <i>80</i>	
C	3	Tower	89	89 <i>75 side</i>	
D	3	Tower	91	91 <i>55 side</i>	
E	3	Tower	221	221 <i>200 side</i>	
F	3	Tower	50	50 <i>44 side</i>	

FAA NOTIFICATION

LOC	F11. FAA notified? Yes No	F12. Date FAA Notification Filed	F13. FAA Regional Office Notified	F14. FAA Study Number
A	Y		Jamacia, NY	93 AEA-1601-OE <i>1537</i>
B	Y			89 AEA-0669-OE
C	Y			89 AEA-0502-OE
D	Y			KYB-745
E	Y			84 AEA-2132-OE
F	Y			no std #, FCC file# 701182-0

FCC 600	FEDERAL COMMUNICATIONS COMMISSION SCHEDULE G Technical Data <small>(all services except those for which Schedule A is required)</small>	<small>Approved by OMB 1486-0022 Exhibit 1434-67 Stat. Reg. Bulletin Board For Response: 4 hrs</small> <div style="border: 1px solid black; padding: 2px; text-align: center;">FCC Use Only</div>
--------------------	---	---

Licensee Name <i>20</i> Carroll, County of	Radio Service YF	Call Sign or Station Location (City, State) Westminster, MD
---	---------------------	--

LOC	G1. Frequency (MHz)	G2. Station Class	G3. No. Units	G4. Emission	G5. Output	G6. ERP	G7. AAT (meters)	G8. Ant. Ht. (meters)
A	867.4500	FB2C	1	20K0F3E	100	56.6	53	69
	867.1875	"	"	"	"	"	"	"
	867.2250	"	"	"	"	"	"	"
	867.3875	"	"	"	"	"	"	"
	867.4250	"	"	"	"	"	"	"
	867.4750	"	"	"	"	"	"	"
	867.5875	"	"	"	"	"	"	"
	867.9375	"	"	"	"	"	"	"
	867.1375	"	"	"	"	"	"	"
B	867.4500	"	"	"	"	55	60	75
	867.1875	"	"	"	"	"	"	"
	867.2250	"	"	"	"	"	"	"
	867.3875	"	"	"	"	"	"	"
	867.4250	"	"	"	"	"	"	"
	867.4750	"	"	"	"	"	"	"
	867.5875	"	"	"	"	"	"	"
	867.9375	"	"	"	"	"	"	"
	867.1375	"	"	"	"	"	"	"
C	867.4500	"	"	"	"	58	131	75
	867.1875	"	"	"	"	"	"	"
	867.2250	"	"	"	"	"	"	"
	867.3875	"	"	"	"	"	"	"
	867.4250	"	"	"	"	"	"	"
	867.4750	"	"	"	"	"	"	"
	867.5875	"	"	"	"	"	"	"
	867.1375	"	"	"	"	"	"	"
D	867.4500	"	"	"	"	57	140	53
	867.1875	"	"	"	"	"	"	"
	867.2250	"	"	"	"	"	"	"

*WPA. COX
FED EX*

MOTOROLA, INC.
1270 FAIRFIELD ROAD
SUITE 5
GETTYSBURG, PA 17325

*APLO
SC*

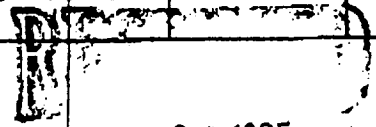
Nat'l Plan

SEP 7 1997

82

LOC	G1. Frequency (MHz)	G2. Station Class	G3. No. Units	G4. Emission	G5. Output	G6. ERP	G7. AAT (meters)	G8. Ant. Ht. (meters)
D	867.3875	FB2C	1	20K0F3E	100	57	140	53
	867.4250	"	"	"	"	"	"	"
	867.4750	"	"	"	"	"	"	"
	867.5875	"	"	"	"	"	"	"
	867.9375	"	"	"	"	"	"	"
	867.1375	"	"	"	"	"	"	"
E	867.4500	"	"	"	"	54	243	200
	867.1875	"	"	"	"	"	"	"
	867.2250	"	"	"	"	"	"	"
	867.3875	"	"	"	"	"	"	"
	867.4250	"	"	"	"	"	"	"
	867.4750	"	"	"	"	"	"	"
	867.5875	"	"	"	"	"	"	"
	867.9375	"	"	"	"	"	"	"
	867.1375	"	"	"	"	"	"	"
F	867.4500 X	"	"	"	"	56	113	44
	867.1875	"	"	"	"	"	"	"
	867.2250	"	"	"	"	"	"	"
	867.3875	"	"	"	"	"	"	"
	867.4250	"	"	"	"	"	"	"
	867.4750	"	"	"	"	"	"	"
	867.5875	"	"	"	"	"	"	"
	867.9375	"	"	"	"	"	"	"
	867.1375	"	"	"	"	"	"	"
G	822.4500	MO	854	"	35	35		
	822.1875	"	"	"	"	"		
	822.2250	"	"	"	"	"		
	822.3875	"	"	"	"	"		
	822.4250	"	"	"	"	"		
	822.4750	"	"	"	"	"		
	822.5875	"	"	"	"	"		
	822.9375	"	"	"	"	"		
	822.1375	"	"	"	"	"		
H	822.4500	FX1	25	"	"	"		
	822.1875	"	"	"	"	"		
	822.2250	"	"	"	"	"		

Freq. cont.



SEP 20 1995

037

APCO

SLOW GROWTH JUSTIFICATION:

Carroll County, MD requests Slow Growth per FCC Rule section 90.629. The county will be implementing a nine channel trunked system with 854 mobile units and 25 control stations in operation. The applicant is required by law to follow a multi-year cycle for its planning, approval, funding, purchase, and construction. The county has received full funding this year and within 15 months to 39 months will be fully constructed.

IMPLEMENTATION SCHEDULE:

December 1996	6 base stations constructed
December 1997	1 base station constructed
December 1998	2 base stations constructed

Mobile/portable and control stations will be added to the system in accordance with the loading requirements of 90.631 (b).

SEP 20 1995

APCO

**Public Safety Radio Communications Plan
Region 20 *
Maryland, Washington, D.C. and Northern Virginia
Regional Plan Review Committee**

Mailing Address:

Howard S. Redman, Jr. (RPRC Secretary)
Carroll County (MD) Emergency Manager
1345 Washington Road
Westminster, MD 21157
VOICE: 410-848-1463
FAX: 410-848-3794

RPRC Chairman:

Steve Souder
Administrator
Arlington County, Virginia
Emergency Communications Center
2100 North 15th Street
Arlington, VA 22201
VOICE: 703-358-4000
FAX: 703-358-3989



April 29, 1994

Mr. Howard Redman
Carroll County Emergency Communications
1345 Washington Rd.
Westminster MD 21157

Dear Buddy:

I regret the long delay in confirming the Region 20 award of (9) NPSPAC 821 MHz channels to Carroll County from our initial notification of last September, but the necessary intermediate FCC plan modification took longer than expected. Also, the Region 20 Technical Committee has had to integrate the Window One frequency matrix modifications into the Plan while correcting several typo errors.

The list of (9) NPSPAC frequencies being assigned to Carroll County is attached to this letter. While we do not yet have confirmation from the Pennsylvania regional committees that this assignment table is acceptable to them, the risk factor there is very small as we know of little or no 821MHz system construction activity anywhere within range of your proposed system.

This letter will serve as official notification of frequency coordination to Carroll County, and should be attached to your revised FCC 574 forms when transmitted to the APCO coordination office. Please send us a copy of said 574's when they are submitted. This coordination is valid for a period of (6) months from the above date.

Concur:

Sincerely,

Jonathan P. Bigony
Jon Bigony, APCO
Coordinator MD/DC

Steve Souder
Steve Souder, Chmn.
Region 20

W. Van Aller
W. Van Aller
for Region 20

01/23/97

15:14

ITS GETTYSBURG -> 12023716279

NO.204 012

490 No.
05/26/94

1

REGION 20 CHANNEL ASSIGNMENTS

CHANNEL ORIGINAL PLAN ASSIGNMENT	AREA ASSIGNED FIRST WINDOW	AREA ASSIGNED SECOND WINDOW	ASSIGNMENTS ALL WINDOWS	NOTES
686 UNASSIGNED	CALVERT	CARROLL	CARROLL	
690 UNASSIGNED	CALVERT	CARROLL	CARROLL	
693 UNASSIGNED	UNASSIGNED	CARROLL	CARROLL	
706 DEJIL	UNASSIGNED	CARROLL	CARROLL	
709 HARFORD	UNASSIGNED	CARROLL	CARROLL	
711 UNASSIGNED	UNASSIGNED	CARROLL	CARROLL	
713 UNASSIGNED	UNASSIGNED	CARROLL	CARROLL	
720 BALTIMORE	UNASSIGNED	CARROLL	CARROLL	
748 UNASSIGNED	UNASSIGNED	CARROLL	CARROLL	

SEP 20 1995

CO

LOUISVILLE



U.S. Department of Transportation
Federal Aviation Administration

NAD 83

Eastern Region

Flaggville Federal Building
John F. Kennedy International Airport
Jamaica, New York 11430

ACKNOWLEDGEMENT OF NOTICE OF EXISTING CONSTRUCTION OR ALTERATION

CITY	STATE	LATITUDE/LONGITUDE	MSL	AGL	ANSL
SANDYVILLE	MD	39-27-43.00 076-54-39.00	576	315	891

SOUTHWESTERN BELL MOBILE SYSTEMS
CELLULAR ONE WASHINGTON/BALTIMORE
7855 WALKER DRIVE, SUITE 100
GREENBELT, MD 20770

AERONAUTICAL STUDY
No: 93-AEA-1539-OE

Type Structure: ANTENNA TOWER 869-891 MHZ AT 100 WATTS

The Federal Aviation Administration hereby acknowledges receipt of notice dated 07/15/93 concerning the existing construction or alteration contained herein.

A study has been conducted under the authority of sections 307(A) and 313(A) of the Federal Aviation Act to determine whether the existing structure would be an obstruction to air navigation, and/or whether it should be marked and lighted to enhance safety in air navigation. The findings of that study are as follows:

The existing construction would not exceed FAA obstruction standards and would not be a hazard to air navigation. However, the following applies to the existing construction:

The structure should be obstruction marked and lighted per FAA Advisory Circular AC 70/7460-1K, 'Obstruction Marking and Lighting'. CHAPTERS: ~~3~~-3 ~~4~~-4 ~~5~~-5 -6 -7 -8 -9 -10 -11 -12 ~~13~~-13.

If the structure is subject to the licensing authority of the FCC, a copy of this acknowledgement will be sent to that Agency.

NOTICE IS REQUIRED ANYTIME THE PROJECT IS ABANDONED OR THE PROPOSAL IS MODIFIED

SIGNED Richard J. Picone Specialist, Systems Management Branch
Richard J. Picone (718) 553-1230/1228
ISSUED IN: Jamaica, New York ON 10/20/93

FEDERAL COMMUNICATIONS COMMISSION SUPPLEMENTAL RETURN FOR ANTENNA INFORMATION

FILE NO. D001664

DATE/INITIALS 10-19-95 KDP

Support Services Branch has reviewed the information concerning the antenna structure for this application. Clearance cannot be given for the reason(s) checked below.

Complete items _____ for site(s) _____

Provide the following breakdown and/or a sketch of your antenna structure for site _____; building height _____ tower height _____ antenna height _____

You must file FAA Form 7460-1 with the FAA for site _____. See FCC Rule 17.7.

____ Your overall height exceeds 200 feet above ground

____ Your overall height of _____ falls slope for _____ by _____ ft

Antenna information provided on your application for site _____ does not agree with data we have on file (see below). Amend application or file with FAA.

____ Coordinates: _____

____ Ground Elevation: _____

____ Antenna height above ground level (AGL): _____

____ Structure height above ground level: _____

____ Overall height above mean sea level (AMSL): _____

____ FAA Study Number: _____

____ Other: _____

Although the Commission has previously licensed this structure at site _____, we cannot confirm that the FAA has been notified. Please submit documentation showing FAA notification or file FAA Form 7460-1 and resubmit your application with a copy of the FAA filing. You do not have to wait for FAA to complete their study before refiling your application.

We will hold application for _____ 30, _____ 60, _____ 90 days pending receipt of FAA advisory for site _____.

FAA has determined site _____ to be a hazard. See attached FAA advisory.

FAA final advisory has not been received for site _____. Submit a copy to expedite processing.

An FAA determination normally expires 6 months from date of issue. Since the Commission did not receive an application for site A prior to 4/94 and we do not show this as an existing structure in our database, you must refile with the FAA for an extension. FAA study 93-AEA-1539-02.

We have reviewed the documentation provided for shielding at site _____. However, it does not provide evidence beyond all reasonable doubt that the structure so shielded will not adversely affect safety in air navigation (Refer to Rule Section 17.14a). Therefore, you must file with the FAA.

Other: _____

FEDERAL COMMUNICATIONS COMMISSION
1270 FAIRFIELD ROAD
GETTYSBURG, PA 17325-7245

*RE-Subm FCC
G=HYS 12-1-95*

**APPLICATION RETURN NOTICE FOR THE
PRIVATE LAND MOBILE RADIO SERVICES**

attn: Howard S Redman Jr
County of Carroll
225 N Center St
Westminster MD 21157

DATE	10/25/95
FILE NO.	001664 adr

INSTRUCTIONS: Your application for station authorization is returned for the reason(s) checked below. Complete or correct your application, re-sign and date your application in the space provided on the reverse side. Return this and all enclosures to the above address. See "NOTICE TO APPLICANT" on the reverse of this form.

- Your eligibility is unclear. Please provide a more detailed description of your activities and how radio will be used in connection with them.
- If you are requesting authority to acquire a station presently licensed to another person or entity, you should check "Assignment of Authorization" in Item 32. Complete the application giving all information pertaining to the new licensee (including eligibility showing) and include a completed FCC Form 1046, Assignment of Authorization, or a similar declaration signed by the present licensee, with your application.
- Please advise if the Control you show in item 18 is a Control Station or Control Point. For Control Stations, complete items 1 through 11 (except 7), 14 through 17, and 26 through 29. If the Control Station complies with the 20 ft. criterion as defined in Rule Section 90.119(a)(2)(ii), complete only items 1 through 5. Evidence of frequency coordination is required for stations not meeting the 20 ft. rule.
- You MUST resubmit this application through your frequency coordinator if you are requesting the licensing of a new station, modifying an existing licensed station, or if you are making ANY CHANGE to information in items 1 through 25 which has previously been coordinated. See Rule Sections 90.135 and 90.175. FAILURE TO DO SO COULD RESULT IN DISMISSAL OF YOUR APPLICATION AND FORFEITURE OF ANY FEE(S) PAID. Failure to resubmit your application in a timely manner as explained on the reverse of this form will also result in loss of any previously paid fee(s).
- Item(s) _____ should be completed or corrected.

OTHER: See the attached supplemental return for antenna information and make the amendment and resubmit for further processing and see Form 7460-1.

Any changes that require coordination, please resubmit thru the coordinator.

As. see attached FAA acknowledgment

FCC 600 Main Form FEDERAL COMMUNICATIONS COMMISSION Application for Mobile Radio Service Authorization or Rural Radiotelephone Service Authorization	Approved by OMB 200-4623 Expires 10/31/97 Est. Reg. Burden Hours Per Response: 4 hrs.	FCC Use Only (File Number) 001665
	FEE Use Only	

FILING FEE

(a) Fee Type Code	(b) Fee Multiple	(c) Fee Due for Fee Type Code in (a)	(d) Total Amount Due	FEE Use Only
			\$	

APPLICANT

WPI0515

DD

1. Legal Name of Applicant Carroll, County of	2. Voice Telephone Number (410) 848-6717
3. Assumed Name Used for Doing Business (if any)	4. Fax Telephone Number ()
5. Mailing Street Address or P.O. Box 225 N. Center Street ATTENTION: Howard S. Redman, Jr.	
6. City Westminster	7. State MD
	8. Zip Code 21157
9. Name of Contact Representative (if other than applicant) Eric Larsen (Susan Colgan)	10. Voice Telephone Number (410) 712-6286
11. Firm or Company Name Motorola Inc.	12. Fax Telephone Number (410) 712-6244
13. Mailing Street Address or P.O. Box 7230 Parkway Drive	
14. City Hanover	15. State MD
	16. Zip Code 21157

CLASSIFICATION OF FILING

17. This filing is a (an) <input checked="" type="checkbox"/> N <u>New application</u> <u>Amendment to a pending application</u>	
18. Does the applicant believe that this filing should be classified as MINOR under 47 U.S.C. § 309? <input checked="" type="checkbox"/> D <u>Yes</u> <u>No</u> <u>Does not apply</u>	
19. If not minor under 47 U.S.C. § 309, classification for purposes of competitive bidding: <input type="checkbox"/> <u>Initial</u> <input type="checkbox"/> <u>Modification</u> <input type="checkbox"/> <u>Renewal</u>	
20. If this filing is in reference to an existing station: Call sign of existing station:	21. If this filing is an amendment to a pending application: File number of pending application: Date Filed:

NATURE OF SERVICE

22. This filing is for authorization to provide or use the following type(s) of radio service: <input checked="" type="checkbox"/> P <u>Commercial mobile</u> <u>Private mobile</u> <u>Both commercial and private mobile</u> <u>Fixed</u>	
23. Users are or will be: <input checked="" type="checkbox"/> I <u>Public subscribers</u> <u>Eligibles</u> <u>Internal</u>	24. Status: <input checked="" type="checkbox"/> N <u>Profit</u> <u>Not for profit</u>
25. Interconnected service? <input checked="" type="checkbox"/> Y <u>Yes</u> <u>No</u>	26. Radio Service code: <input type="checkbox"/> YF <u>YF</u>
27. Type of operation code: <input type="checkbox"/> <u> </u>	

11-2-95

ENVIRONMENTAL POLICY

28. Would a Commission grant of any proposal in this application or amendment have a significant effect as defined by 47 CFR 1.1307? * If "yes", attach environmental assessment as required by 47 CFR 1.1308 and 47 CFR 1.1311.	environmental	[N]	Yes	No
---	---------------	-------	-----	----

ALIEN OWNERSHIP

29. Is the applicant a foreign government or the representative of any foreign government?		[N]	Yes	No
30. Is the applicant an alien or the representative of an alien?		[N]	Yes	No
31. Is the applicant a corporation organized under the laws of any foreign government?		[N]	Yes	No
32. Is the applicant a corporation of which any officer or director is an alien or of which more than one-fourth of the capital stock is owned of record or voted by aliens or their representatives or by a foreign representative thereof or by any corporation organized under the laws of a foreign country?	one-fourth of the government or	[N]	Yes	No
33. Is the applicant a corporation directly or indirectly controlled by any other corporation of which more than one-fourth of the directors are aliens, or of which more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives, or by a foreign government or representative thereof, or by any corporation organized under the laws of a foreign country? * If "yes", attach exhibit explaining nature and extent of alien or foreign ownership or control.	any officer or more than one-fourth of the capital stock is owned of record or voted by aliens, their representatives or representative	[N]	Yes	No

BASIC QUALIFICATIONS

34. Has the applicant or any party to this application or amendment had any FCC station authorization, license or construction permit revoked or had any application for an initial, modification or renewal of FCC station authorization, license, construction permit denied by the Commission? * If "yes", attach exhibit explaining circumstances.	on, license or construction permit denied by the Commission?	[N]	Yes	No
35. Has the applicant, or any party to this application or amendment, or any party directly or indirectly controlling the applicant ever been convicted of a felony by any state or federal court?		[N]	Yes	No
36. Has any court finally adjudged the applicant, or any person directly or indirectly controlling the applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition?	applicant, guilty of unlawfully monopolizing or attempting unlawfully to monopolize radio communication, directly or indirectly, through control of manufacture or sale of radio apparatus, exclusive traffic arrangement or any other means or unfair methods of competition?	[N]	Yes	No
37. Is the applicant, or any person directly or indirectly controlling the applicant, currently a party in any pending matter referred to in the preceding two items?		[N]	Yes	No
38. Does the undersigned certify (by responding "Y" to this question), that neither the applicant nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance? * See 47 CFR 1.2002(b) for the meaning of "party to the application" for these purposes.	nor any other party to the application is subject to a denial of Federal benefits that includes FCC benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862, because of a conviction for possession or distribution of a controlled substance?	[Y]	Yes	No

CERTIFICATION

SEP 20 1995

The APPLICANT waives any claim to the use of any particular frequency or of the electromagnetic spectrum as against the regulatory power of the United States because of the previous use of the same, whether by license or otherwise, and requests an authorization in accordance with this application. The applicant certifies that grant of this application would not cause the applicant to be in violation of the spectrum aggregation limit in 47 CFR Part 20. All statements made in exhibits are a material part hereof and are incorporated herein as if set out in full in this application. The undersigned, individually and for the applicant, hereby certifies that all statements made in this application and in all attached exhibits are true, complete and correct to the best of his or her knowledge and belief, and are made in good faith.

39. Applicant is a (an) [G] Individual <u>Unincorporated Association</u> Partnership Corporation Governmental Entity	
40. Typed Name of Person Signing Howard S. Redman Jr.	41. Title Administrator of Public Safety
42. Signature Howard S. Redman Jr.	43. Date P-10-95

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. Code, Title 18, Section 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. Code, Title 47, Section 312(a)(3)), AND/OR FORFEITURE (U.S. Code, Title 47, Section 503).

RECEIVED
SEP 20 1995

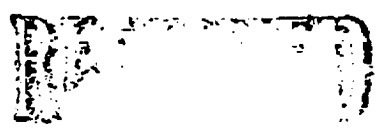
SLOW GROWTH JUSTIFICATION:

Carroll County, MD requests Slow Growth per FCC Rule section 90.629. The county will be implementing a nine channel trunked system with 854 mobile units and 25 control stations in operation. The applicant is required by law to follow a multi-year cycle for its planning, approval, funding, purchase, and construction. The county has received full funding this year and within 15 months to 39 months will be fully constructed.

IMPLEMENTATION SCHEDULE:

- December 1996 6 base stations constructed
- December 1997 1 base station constructed
- December 1998 2 base stations constructed

Mobile/portable and control stations will be added to the system in accordance with the loading requirements of 90.631 (b).



SEP 20 1995

APCO

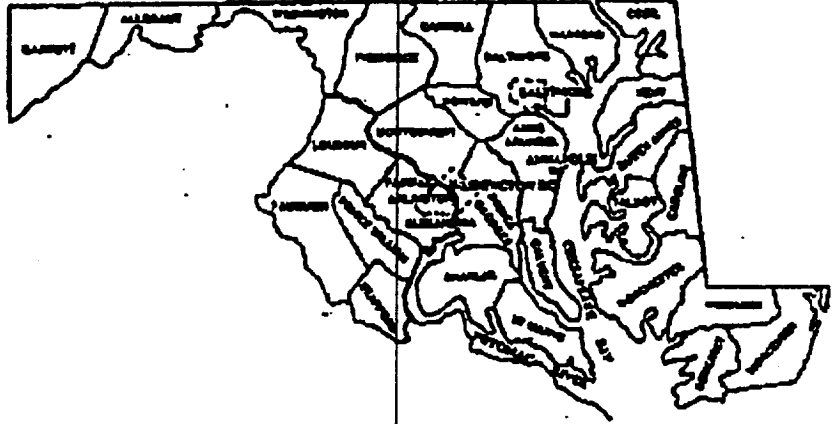
**Public Safety Radio Communications Plan
Region 20 *
Maryland, Washington, D.C. and Northern Virginia
Regional Plan Review Committee**

Mailing Address:

Howard S. Redman, Jr. (RPRC Secretary)
Carroll County (MD) Emergency Manager
1345 Washington Road
Westminster, MD 21157
VOICE: 410-848-1488
FAX: 410-848-3794

RPRC Chairman:

Steve Souder
Administrator
Arlington County, Virginia
Emergency Communications Center
2100 North 15th Street
Arlington, VA 22201
VOICE: 703-358-4080
X: 703-358-3989



April 29, 1994

Mr. Howard Redman
Carroll County Emergency Communications
1345 Washington Rd.
Westminster MD 21157

Dear Buddy:

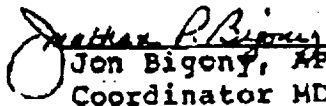
I regret the long delay in confirming the Region 20 award of (9) NPSPAC 821 MHz channels to Carroll County from our initial notification of last September, but the necessary intermediate FCC plan modification took longer than expected. Also, the Region 20 Technical Committee has had to integrate the Window One frequency matrix modifications into the Plan while correcting several typo errors.

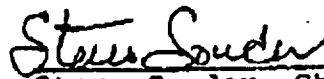
The list of (9) NPSPAC frequencies being assigned to Carroll County is attached to this letter. While we do not yet have confirmation from the Pennsylvania regional committees that this assignment table is acceptable to them, the risk factor there is very small as we know of little or no 821MHz system construction activity anywhere within range of your proposed system.

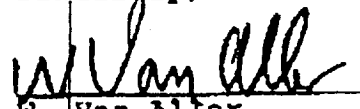
This letter will serve as official notification of frequency coordination to Carroll County, and should be attached to your revised FCC 574 forms when transmitted to the APCO coordination office. Please send us a copy of said 574's when they are submitted. This coordination is valid for a period of (6) months from the above date.

Concur:

Sincerely,


Jon Bigony, APCO
Coordinator MD/DC


Steve Souder, Chmn.
Region 20


W. Van Aller
for Region 20

01/23/97

15:14

ITS GETTYSBURG -> 12023716279

NO. 204

021

Age No. 1
05/25/94

REGION 20 CHANNEL ASSIGNMENTS

CHANNEL ORIGINAL PLAN ASSIGNMENT	AREA ASSIGNED FIRST WINDOW	AREA ASSIGNED SECOND WINDOW	ASSIGNMENTS ALL WINDOWS	NOTES
686 UNASSIGNED	CALVERT	CARROLL	CARROLL	
690 UNASSIGNED	CALVERT	CARROLL	CARROLL	
693 UNASSIGNED	UNASSIGNED	CARROLL	CARROLL	
706 CECIL	UNASSIGNED	CARROLL	CARROLL	
709 HANFORD	UNASSIGNED	CARROLL	CARROLL	
711 UNASSIGNED	UNASSIGNED	CARROLL	CARROLL	
713 UNASSIGNED	UNASSIGNED	CARROLL	CARROLL	
720 BALTIMORE	UNASSIGNED	CARROLL	CARROLL	
748 UNASSIGNED	UNASSIGNED	CARROLL	CARROLL	

SEP 20 1995

CO

FCC 600	FEDERAL COMMUNICATIONS COMMISSION SCHEDULE D Administrative Data (all services except those for which Schedule A is required)	<small>Approved by Call 1360-0625 License 10-2-97 Est. Avg. Burden Hours Per Response 4 hrs</small>
		FCC Use Only

90

Licensee Name Carroll County of	Radio Service YF	Call Sign or Station Location (City, State) Sykesville, MD
---	----------------------------	--

PURPOSE OF FILING

D1. The purpose of this filing is to: <input type="checkbox"/> [N] <input checked="" type="checkbox"/> [M] request a new station license. <input type="checkbox"/> [] <input checked="" type="checkbox"/> [M] modify an existing licensed station(s). <input type="checkbox"/> [] <input checked="" type="checkbox"/> [R] renew an existing licensed station. <input type="checkbox"/> [] <input checked="" type="checkbox"/> [X] reinstate an expired call sign. <input type="checkbox"/> [] <input checked="" type="checkbox"/> [A] assign an existing license.	D2. If system licensing, list call signs of stations to be combined. (First call sign will be retained)
---	---

D3. Specify proposed modifications, if any:
--

ASSOCIATED CALL SIGNS

D4. Call signs:

RADIO SYSTEM OPERATION POINT OF CONTACT

D5. Street Address, City, State 225 N. Center Street Westminster, MD	D6. Voice Telephone Number (410) 848-6717
---	---

ASSOCIATED BROADCAST STATION

D7. Call Sign	D8. City	D9. State
----------------------	-----------------	------------------

MARKET AREA

D10. Market Area / Number

PAGING OPERATIONS

D11. Number of Paging Receivers
--

ELIGIBILITY

D12. Describe Activity Applicant is the Carroll County Maryland. The radios will be used for official governmental business activities.	D13. Rule Section 90.17(a)
---	--------------------------------------

90

D14. Frequency Coordination Number [5314001076]
--

APPROVED APCO NATIONAL PLAN

By: Shurham Date: 9-20-95

FCC 600 FEDERAL COMMUNICATIONS COMMISSION SCHEDULE E Station Location Data <small>(all services except those for which Schedule A is required)</small>	<small>Approved by OMB MMS-0670 Expires 10/31/97 Get Any Bureau Hours Per Response 4-100</small>
	FCC Use Only

Licenses Name Carroll, County of	Radio Service YF	Call Sign or Station Location (City, State) Sykesville, MD
--	----------------------------	--

E1. Specify the datum used to determine all coordinates on this filing: [2] NAD27 NAD83 Other (Specify _____)

FIXED OR PERMANENT LOCATIONS

LOC	E2. Station Address / Geographic Location	E3. City	E4 County	E5. State
A	Springfield Hosp. on Sykesville Rd	Sykesville	Carroll	MD
B				
C				
D				
E				
F				

LOC	E6. Latitude (degrees, minutes, seconds)	E7. Longitude (degrees, minutes, seconds)	E8. Ground Elevation (meters)
A	39 23 12	76 57 29	163
B			
C			
D			
E			
F			

CONTROLS MEETING THE 20 FOOT CRITERIA, MOBILE OR TEMPORARY LOCATIONS

LOC	E9. Radius (km)	E10. Area of Operation Code	E11.		COUNTY	STATE	E12 Operations (S: South of Line A and/or (W) West of Line C
			LATITUDE	LONGITUDE			
G	32	P	39 ° 34 ' 22	76 ° 58 ' 18	Carroll	MD	
H		8	- -	- -		MD	
			- -	- -			
			- -	- -			
			- -	- -			

FCC 600	FEDERAL COMMUNICATIONS COMMISSION SCHEDULE F Antenna Structure Data (All Services)	<small>Approved by OMB 1000-0023 Expires 10/31/97 Est. Avg. Burden Hours Per Response: 1 hrs</small>
		FCC Use Only

Licensee Name <i>DD</i> Carroll, County of	Radio Service YF	Call Sign or Station Location (City, State) Sykesville, MD
--	----------------------------	--

STATUS AND IDENTIFYING INFORMATION

LOC	F1. Location Number	F2. <u>NEW</u> or Existing	F3. Call Sign of Existing Station	F4. Radio Service	F5. Tower Owner's Name and Telephone Number
A		N			()
B					()
C					()
D					()
E					()
F					()

STRUCTURE TYPE AND HEIGHT

LOC	F6. Figure Number (see reverse)	F7. Structure Type	F8. Height of Support Structure (b) (meters)	<i>DD</i> F9. Overall Height of Structure (d) (meters)	F10. FCC Tower Number
A	3	Tower	55	<i>55.45</i>	
B					
C					
D					
E					
F					

FAA NOTIFICATION

LOC	F11. FAA notified? <u>Yes</u> <u>No</u>	F12. Date FAA Notification Filed	F13. FAA Regional Office Notified	F14. FAA Study Number
A	N			
B				
C				
D				
E				
F				

FCC 600	FEDERAL COMMUNICATIONS COMMISSION SCHEDULE G Technical Data (all services except those for which Schedule A is required)	Approved by OMB 1000-0021 Expires 10/31/97 Est. Reg. Bureau Hours Per Response 4 rev.
		FCC Use Only

SP

Licensee Name Carroll, County of	Radio Service YF	Call Sign or Station Location (City, State) Sykesville, MD
--	----------------------------	--

Loc	G1 Frequency (MHz)	G2 Station Class	G3 No. Units	G4 Emission	G5 Output	G6 ERP	G7 AAT (meters)	G8 Ant. Ht. (meters)
A	867.4500	FB2C	1	20K0F3E	100	57	39	49
A	867.1875	"	"	"	"	"	"	"
A	867.2250	"	"	"	"	"	"	"
A	867.3875	"	"	"	"	"	"	"
A	867.4250	"	"	"	"	"	"	"
A	867.4750	"	"	"	"	"	"	"
A	867.5875	"	"	"	"	"	"	"
A	867.9375	"	"	"	"	"	"	"
A	867.1375	"	"	"	"	"	"	"
G	822.4500	MO	854	"	35	35		
G	822.1875	"	"	"	"	"		
G	822.2250	"	"	"	"	"		
G	822.3875	"	"	"	"	"		
G	822.4250	"	"	"	"	"		
G	822.4750	"	"	"	"	"		
G	822.5875	"	"	"	"	"		
G	822.9375	"	"	"	"	"		
G	822.1375	"	"	"	"	"		
H	822.4500	FX1	25	"	35	35		
H	822.1875	"	"	"	"	"		
H	822.2250	"	"	"	"	"		
H	822.3875	"	"	"	"	"		
H	822.4250	"	"	"	"	"		
H	822.4750	"	"	"	"	"		
H	822.5875	"	"	"	"	"		
H	822.9375	"	"	"	"	"		
H	822.1375	"	"	"	"	"		
G	867.4500	MO	854	"	35	35		
G	867.1875	"	"	"	"	"		

XD
DD

Handwritten: **FED EX**
SEP 7 1997

MOTOROLA, INC.
 1270 Fairfield Rd.
 Gettysburg, Pa. 17325

Handwritten: **APCO** Nat'l Plan
FCC 600 - Schedule G
 December 1994

CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on this 3rd day of September, 1998, I caused copies of the foregoing document to be served by first class mail, to the following:

Chairman William E. Kennard*
Federal Communications Commission
1919 M Street, NW, Room 814
Washington, DC 20554

Commissioner Susan S. Ness*
Federal Communications Commission
1919 M Street, NW, Room 832
Washington, DC 20554

Commissioner Harold Furchtgott-Roth*
Federal Communications Commission
1919 M Street, NW, Room 802
Washington, DC 20554

Commissioner Michael K. Powell*
Federal Communications Commission
1919 M Street, NW, Room 844
Washington, DC 20554

Commissioner Gloria Tristani*
Federal Communications Commission
1919 M Street, NW, Room 826
Washington, DC 20554

Dale Hatfield, Chief*
Office of Engineering & Technology
Federal Communications Commission
2000 M Street, NW, Room 480
Washington, DC 20554

Christopher Wright, General Counsel*
Federal Communications Commission
1919 M Street, NW, Room 614
Washington, DC 20554

Daniel Phythyon, Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 5002
Washington, DC 20554

Rosalind K. Allen, Deputy Chief*
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 5002
Washington, DC 20554

Josh Roland, Legal Advisor*
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 5002
Washington, DC 20554

D'wana R. Terry, Chief*
Public Safety & Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 8010
Washington, DC 20554

John Clark, Deputy Chief*
Public Safety & Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 8010
Washington, DC 20554

Kathryn Hosford*
Public Safety & Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 8010
Washington, DC 20554

Mr. Steve H. Souder, Chairman
Region-20 Public Safety Regional Plan
Review Committee
Arlington County (VA) Emergency
Communications Center
1400 North Uhle Street, 5th Floor
Arlington, VA 22201-9995

Dr. Michael C. Trahos, D.O., NCE, CET -
Chairman
Region-20 RPRC Legislative/Regulatory
Affairs Committee
4600 King Street, Suite 6K
Alexandria, VA 22302-1249

Mr. Alan T. Kealey, Vice-Chairman
Region-20 Public Safety Regional Plan
Review Committee
State of Maryland
Department of Budget and Management
Office of Information Technology
45 Calvert Street
Annapolis, MD 21401

Mr. Howard S. Redman, Jr., Secretary
Region-20 Public Safety RPRC
Administrator - Carroll County Office of
Public Safety
225 N. Center Street
Westminster, MD 21157

W. Michael Trupman, Esq.
Lawrence W. Lewis, Esq.
Deputy Attorney Generals
Department of Justice
State of Delaware
820 North French Street, 6th Floor
Wilmington, DE 19801

Col. Carl A. Williams, Superintendent
New Jersey State Police
P.O. Box 7068
West Trenton, NJ 08628

*Hand Delivery

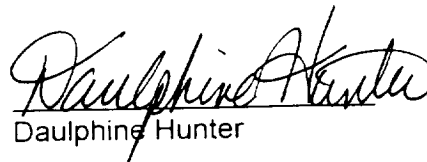
Mr. Richard R. Reynolds, Chairman
Region-28 Public Safety Planning Update
Committee
Office of Telecommunications Management
State of Delaware
801 Silver Lake Boulevard
Dover, DE 19904-2460

Mr. Norman R. Coltri, P.E., Vice-Chairman
Region-28 Public Safety Planning Update
Committee
New Jersey State Police
Box 7068, Number 2 Trooper Drive
West Trenton, NJ 08628

Mr. M. Jay Groce, III, Deputy Director
Chester County Department of Emergency
Services
601 Westtown Road, Suite 12
West Chester, PA 19382

Mr. Frank W. Stoda, Senior Engineer
Radio Engineering and Services Branch
Network Services Division
Department of Information Technology
County of Fairfax (VA)
3613 Jermantown Road
Fairfax, VA 22030

Mr. Ali Shahnam
APCO AFC, Inc.
2040 South Ridgewood Avenue
South Daytona, FL 32119


Daulphine Hunter