



August 26, 2016

Federal Communications Commission
Public Safety and Homeland Security Bureau
1270 Fairfield Road
Gettysburg, PA 17325-7245

In the Matter of:

Cumberland, County of
637 Bridgeton Rd.
Bridgeton, NJ 08302

Application: CAP003618

FRN: 0003324332

Frequencies:	769.28125	MHz	799.28125	MHz
	769.78125	MHz	799.78125	MHz
	770.03125	MHz	800.03125	MHz
	770.29375	MHz	800.29375	MHz
	771.04375	MHz	801.04375	MHz
	771.54375	MHz	801.54375	MHz
	772.03125	MHz	802.03125	MHz
	772.30625	MHz	802.30625	MHz
	772.85625	MHz	802.85625	MHz
	773.19375	MHz	803.19375	MHz
	773.68125	MHz	803.68125	MHz
	773.95625	MHz	803.95625	MHz
	774.21875	MHz	804.21875	MHz

Locations: All

REQUEST FOR SLOW GROWTH (EXTENDED IMPLEMENTATION)

V-COMM, L.L.C., located at 2540 U.S. Highway 130, Suite 101, and Cranbury, NJ 08512 hereby submits this request on behalf of the County of Cumberland, New Jersey.

V-COMM has been retained by the County of Cumberland to act on its behalf in regards to their wireless communications systems.

In accordance with Rule number §90.629, §90.155(b) and §90.551, the County of Cumberland is requesting an extended implementation period to March 12, 2021, for its current Application CAP003618, for the construction of a County-wide 700 MHz digital radio system.

BACKGROUND

Cumberland County is composed of 14 municipalities and boroughs. Within these jurisdictions are a total of 3 police agencies, 22 fire departments, and 9 EMS departments. Currently, Cumberland County conducts county-wide public safety operations with a multi-zoned, conventional communications system utilizing VHF spectrum, which is rapidly approaching end-of-life. In addition, the current system is inadequate for providing interoperability throughout Cumberland County during large-scale field operations. Due to the impending need of a system upgrade and the current system's shortcomings, the decision was made to pursue a communications system upgrade utilizing channels made available to the County in the 700 MHz Public Safety allotment to allow for interoperability, both inter-county and inter-municipality.

In accordance with Rule number 90.20, on July 07, 2016, Cumberland County, New Jersey submitted an application to the Regional Planning Committee (RPC) for Region 28 for a replacement 700 MHz digital trunked radio network to service Cumberland County. The application was approved by RPC 28 and the application was submitted to APCO on July 11, 2016. This application licensed thirteen (13) paired, base-transmit 700 MHz frequencies to support the County's proposed trunked, simulcast Voice

Communications System to be located at six (6) locations throughout Cumberland County, NJ. The County plans to construct the system as licensed.

As a local government entity, Cumberland County is subject to procurement and budgeting consideration faced by all state and local governmental entities in the State of New Jersey under the New Jersey Local Public Contracts Law (N.J.S.A. 40A:11-1 et seq.). As a result, the County must comply with procurement process imposed by New Jersey state statutes and regulations as well as its own internal procurement regulation. Additionally, as a political subdivision of the State of New Jersey, the County is subject to budgetary constraints based upon revenues and fees derived from tax revenues and fees and budgetary appropriations from the Board of Freeholders, its governing body. As a result, the County must follow a multi-year-cycle for the planning, approval, funding and purchasing of its proposed system.

The County is currently investigating budgetary sources, and, with the backing of its Freeholders for this project and the approval of its Commissioners, the County is confident in its ability to secure funding for its 700 MHz radio deployments. Further, the County has already started coordination with the New Jersey State Police to integrate the proposed system with the state system. Ultimately, the County cannot commit funds until the frequencies for the system are allocated to it, but all sources of funding are behind the plan and understand the funding requirements.

In addition, the County has designed and completed construction on a new tower at the Cumberland Fire Company, which currently accommodates the existing VHF antennas and is capable of accommodating the proposed 700 MHz antennas and microwave dishes.

The total cost to develop and construct this tower was in excess of \$700,000. In anticipation of the 700 MHz system, the County has already upgraded all radio dispatch consoles with new equipment capable of P25 Phase II connectivity, at a total cost in excess of \$500,000. Therefore, the County has already committed over \$1.2 million to the 700 MHz radio upgrade and is confident it will secure the funding for the rest of the 700 MHz radio deployments.

Meetings with the primary equipment vendors have been scheduled for the upcoming weeks, and the project will proceed to implementation phases as funding becomes available, so that system development can begin in 2016 and be completed by March 2021.

The County of Cumberland phased implementation plan for the 700 MHz digital trunked radio system is as follows. This plan is consistent with the less detailed plan submitted to RPC Region 8 in applying for the 700 MHz spectrum.

<u>Phase</u>	<u>Timing</u>	<u>Description</u>
1	May 2016 – Mar 2017	FCC License Acquisition
2	Dec 2016 – Sept 2018	Site Acquisition
3	Jun 2017 – Aug 2018	Project Planning and Budgeting
4	Aug 2018 – Feb 2020	Infrastructure Build Out
5	Feb 2020 – Dec 2020	County Subscriber Migration
6	Jan 2021 – Mar 2021	Municipality Subscriber Migration
7	Mar 2021	Final System Acceptance

CONCLUSION

In accordance with Rule number 1.946(e), we are respectfully requesting Slow Growth (Extended Implementation) for the County of Cumberland, New Jersey for a five (5) year

extension of time to March 12, 2021 to complete the construction of the proposed trunked 700 MHz trunked Voice Communications System.

In accordance with Rule numbers §90.629, §90.155(b) and §90.551, we are seeking Slow Growth (extended implementation) on behalf of Cumberland County, New Jersey. We believe that it is in the public interest for the Commission to grant this extension of time and allow the County to implement its new 700 MHz digital radio network supporting emergency communications in Cumberland County. The County has already begun the system implementation process and has already appropriated over \$1.2 million in funding for the 700 MHz radio system upgrade. Rejecting this request for extended implementation application will only add undue burden and expense to the County to reapply to the FCC for the already approved and coordinated radio locations, once they are ready to construct. Further, it should be noted, that there are no negative implications to the FCC granting the requested waiver.

Should you have further questions, please feel free to contact me at (609) 655-1200, ext. 323 or the contact for Cumberland County is William W. Mosley Sr., the 911 Operations Supervisor, (856) 455-8526, ext. 491.

Respectfully Submitted,

A handwritten signature in black ink that reads "David K. Stern". The signature is written in a cursive, flowing style.

David K. Stern
Vice President
V-COMM, L.L.C

cc: William W. Mosley Sr., 911 Operations Supervisor