



**OFFICE OF INFORMATION TECHNOLOGY**

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**Steve Schuh**  
*County Executive*

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Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

September 21, 2016

**REQUEST FOR WAIVER**

To Whom It May Concern:

Anne Arundel County, Maryland (the County) is beginning the process of upgrading and enhancing its 800 MHz trunked radio system to include new data messaging and communications services, including wireless provisioning of subscriber radios and Automatic Resource Location (ARL) services. In order to accommodate these new services, the County seeks to expand the capacity of its public safety radio system by adding three new traffic frequencies. The County, with the assistance of its frequency coordinator (APCO), has identified three frequencies which are currently available for licensing.

One of the three frequencies, 858/813.8375 MHz, is a frequency from the 800 MHz Business, Industrial and Land Transportation (B/ILT) Pool. Use of this frequency by Anne Arundel County requires a waiver of the Commission's rules and the Commission's Inter-Category Sharing Application Freeze.

Frequency research conducted by the County and by APCO finds no available 800 MHz Public Safety Pool frequencies for use in the County. The County respectfully requests a waiver of Section 90.621(e)(5) of the Commission's rules and the Commission's Inter-Category Sharing Application Freeze. Applying the Freeze to the County's application would not serve the purpose of the freeze, as the original intention of the freeze was to protect public safety channels from inter-category sharing applications from B/ILT applicants. Granting of the County's application will allow the County to proceed with the modernization of its public safety radio system and provide efficiency and safety enhancements to the County's first responders who serve County citizens.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Handwritten signature of William C. Dehoff.

William C. Dehoff  
Chief of Telecommunications