

Request For
Special Temporary Authority under FCC 47CFR-1.931
City of Philadelphia
FRN # 0003233707

WAIVER
Urgent Attention Requested

Synopsis

The City of Philadelphia, Pennsylvania (City) respectfully requests that the Commission act to augment the existing City trunked NPSPAC radio system with two (2) additional channels in the Mid-Band that are currently licensed to the City under a separate license (WPUI511 & WPRW578). The STA is requested to begin immediately to permit installation and testing and to continue until August 15, 2016.

Extraordinary Circumstances

The City is host to the Democratic National Convention taking place in a few short weeks. The City has planned for this activity over the time period after the DNC made the decision to locate in Philadelphia. The City had expected that the existing trunked system would be sufficient to accommodate the expected additional radio traffic generated by the Convention. Recent events have highlighted the concern revolving about security issues surrounding the Convention. The tragedy in Orlando and the specter of increased demonstrations at and surrounding the Convention venue have caused the City to plan for additional radio traffic on the trunked system.

The City is currently licensed on two conventional channels in the Mid-Band (812/857.7375 and 813/858.7373 under WNGE384) that could be better utilized as part of the citywide trunking system that serves the City first responders, and during the Convention; DNC, State, and Federal Agencies. It is proposed in this Special Temporary Authority request that the identified channels be added to the existing NPSPAC trunked radio system through a separate authorization in the YP radio service. It is the City's intention to apply for a permanent license to continue the use of these channels in a spectrally efficient P25 trunking system following the Convention.

Issues with the Allocation

The requested allocation of two channels currently licensed to the City under WNGE384 involves co-channel stations below the required separation of 113 km. These existing licensees are identified in the attached listing and are the City of New York FRN# 0003462512 and that State of New Jersey FRN# 0003301355.

Analysis under 47CFR-90.621 Para 6 was performed and shows that the proposed new operation of the City in the trunking system will have a 22 dBμ interference contour that is totally contained within the 22 dBμ interference contour of the existing license, WNGE384. Additionally, the existing short spaced licensees have been served with a copy of the application and attachments as certified in the Certificate of Service.

This request complies with the allocation rules established under 90.621, where a licensee may modify a license provided the new 22 dBμ interference contour is totally contained within the existing licensed 22 dBμ interference contour.