

**Request for Extended Implementation Schedule**  
**Expedited Consideration Requested**  
**County of St Louis, MO**

The County of St Louis, as part of the St. Louis Regional Communications Core Group a consortium of governmental agencies in the Greater St. Louis Region, consisting of the Counties of Franklin, MO, Jefferson MO, Madison, IL, Monroe, IL, St. Charles, MO, St. Clair, IL, St. Louis, MO, and the City of St. Louis MO, requests consideration of SLOW GROWTH IMPLEMENTATION as defined in 47CFR 90.629.

In June 2008, the above-referenced governmental agencies elected to move forward with an interoperability strategy with the adoption of the St. Louis Emergency Land Mobile Emergency Communications Plan. The Emergency Communications Plan is based on the following:

1. Networking independent digital county systems (i.e. system of systems). This consists of interconnecting various county Project 25 trunked digital radio\microwave systems using the new regional microwave system collocated at the county trunked radio sites to improve system reliability and provide regional connectivity.
2. Creating a highly tolerable fault tolerant infrastructure thereby supporting all emergency public safety communications within the region.
3. Designing a system with the capacity and functionality to support additional non-emergency municipal users including local, county, regional, state and federal users.
4. Implementing an open standard (Project 25 and IP) based system of systems that is compatible with regional, as well as the State of Illinois and State of Missouri interoperability initiatives, including Region 13 and 24 Regional Planning Committees.
5. Coordinating with critical infrastructure service providers in the region to improve interoperability and share infrastructure where practical.

**Objectives**

The St. Louis Regional Communications Core Group decided to design a seamless regional interoperability emergency communications network that would efficiently utilize existing spectrum. The required policies and procedures for all members of the St. Louis Regional Communications Core Group are currently under development. Three of the four Missouri localities without P-25 systems have secured funding for the development of specifications, procurement and implementation for new microwave and P-25 radio systems. The remaining county is currently engaged in development of a funding strategy.

## **Governance**

The St. Louis Regional Communications Core Group (RCCG) is a sub-committee to the Executive Board of the East West Gateway Council of Governments (EWG), which serves the greater St. Louis area. Members of the Core Group are appointed by members of the EWG Executive Board. Through the auspices of the EWG an Interlocal Agreement setting forth the governance and policies and procedures for regional interoperability is near completion and will serve as the governing document for the region's public safety communications. . The Core Group also has an Operational Group sub-committee. The Operational Group consists of representatives from fire, emergency communications, emergency management, emergency medical, police and public works representatives. The Operations Group is responsible for the development of communications protocols which once approved by the Core Group become operating procedure for the region. There is also a technical sub-committee to the Operations Group consisting of technical personnel from the member localities that advise the Operations and Core Group on technical matters related to the systems and protocols.

St Louis County has formed a policy group that represents all emergency responders. These groups include county and municipal officials, representatives of municipal fire and police departments and fire and ambulance districts. The county policy groups coordinate county\regional activity with the RCCG. The county policy groups are responsible for coordinating with all emergency response agencies that operate within their respective counties, securing the required funding to implement and operate the county-wide emergency communications systems. County Policy groups have formed county based Operation Groups. The Operations Group is responsible for the development of communications protocols which once approved by the County Policy Group to become operating procedure for the county. There is also a technical sub-committee to the Operations Group consisting of technical personnel from the member localities that advise the Operations and County Policy Group on technical matters related to the systems and protocols.

In summary the RCCG works closely with St Louis County Policy Groups to ensure that any opportunity to improve the effectiveness and efficiency of emergency communications is coordinated with local, county, state and federal emergency response agencies.

## **Background**

The County of St Louis, and local entities contained, have current radio systems based on vintage conventional communications system architecture. These older systems are also using a significant number of VHF frequency channels that were allocated when the systems were initially installed meanwhile the number of radio users and system requirements have increased expediently throughout the County.

These congested outdated systems frequently experience routine severe radio congestion and that forces agencies to limit access to these capacity stressed systems. This then limits interoperability with public service and public safety organizations in the region due to the limited capacity of the existing channels.

## **Current Status**

The County of St. Louis has secured funding for implementing a county-wide system to support all agencies that operate within the County, with capacity to support regional interoperable communications to the systems for all St Louis Regional Communication participants. On November 3, 2009, the County of St Louis passed a dedicated sales tax to fund the development of this new interoperable communications system. A radio consultant has been tasked with the development of system specifications in anticipation of a request for proposal from radio equipment vendors. The specifications are currently in draft review prior to release.

## **Proposed Extended Implementation Schedule**

2010	
2 <sup>st</sup> Quarter	Radio Specifications Updates Initiated
3 <sup>nd</sup> Quarter	Radio System RFP's Released
4 <sup>th</sup> Quarter	Review & Evaluation Initiated
2011	
1 <sup>st</sup> Quarter	Bid Evaluation Completed and Contracts Awarded
2 <sup>st</sup> Quarter	St. Louis County Contracts Awarded
3 <sup>rd</sup> Quarter	Site Development Begins
4 <sup>th</sup> Quarter	System Factory Staging and Acceptance
2012	
1 <sup>nd</sup> Quarter	Fixed Base Installation Begins
3 <sup>rd</sup> Quarter	Installation Completed – Subscriber testing begins
4 <sup>th</sup> Quarter	Initiate final system acceptance testing
2013	
1 <sup>st</sup> Quarter	Install subscriber units into countywide public safety fleet
2 <sup>nd</sup> Quarter	General Acceptance Testing and system cutover
3 <sup>rd</sup> Quarter	System burn-in
4 <sup>th</sup> Quarter	Abandon Legacy frequencies

## **Summary**

The rules, 47CFR 90.625, provides that specific conditions must be met to attain extended implementation status. The time table schedule details the planned approach to the construction of the system. Specifically, in Paragraph (a)(1), due to the purpose, size, and complex nature of the proposed system, which is comprised of eight major governmental entities and numerous smaller public safety entities, as well as covering two states, a one-year period of time to implement channels acquired through giveback spectrum acquisition isn't feasible. Extremely large systems routinely take the full five-years allowed under Section 90.629 of the Commission's rules and in fact there have been instances that those systems have taken

even longer than the Commission's rules permit. Further, in Paragraph (a)(2), the St Louis system is part of a coordinated and integrated wide area system, which will require more than 12 months to purchase, construct and place into operation. The County has passed the funding hurdle and is moving toward the purchase of the new 800 MHz system.

The St. Louis Regional Communications Core Group has been moving forward on all fronts, from working with Regional Planning Committees for additional spectrum, to passing county tax funding initiatives, to working in the development a state of the art interoperability system to serve all jurisdictions.

Therefore, with good cause shown, it is in the public interest, convenience and necessity to grant the subject request for extended implementation. Such extended implementation authority is in the public interest and will foster the development of total interoperability in the St Louis Urban Area Security Initiative plan.