

## Raymond Quianzon

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**From:** Raymond Quianzon  
**Sent:** Tuesday, January 25, 2011 10:25 PM  
**To:** 'Anthony Serafini'; 'Behnam Ghaffari'  
**Cc:** Mitchell Lazarus  
**Subject:** 0205-EX-ST, 0221-EX-ST and 0552-EX-PL (2010)

Messrs. Serafini and Ghaffari -

Thank you for your e-mails about the captioned applications. The applications are a 442 (24 months) for Akela, Inc. and two STAs for Akela and the Los Angeles County Sheriff's Department. The STAs were submitted directly by the applicant to the FCC last April; the 442 was coordinated and submitted through our office last month.

We recently updated all of the applications so that there is no confusion regarding proposed operations. An e-mail exchange between our office and OET occurred in December regarding these adjustments and we have formally made those changes in the applications. All of the frequency adjustments resulted in a reduction of the quantity of spectrum and much smaller radius sought for authorization.

Hopefully these changes will address items raised in your e-mails on the 13th and 14th of January. However, we specifically address certain items below:

**\*\*\* From Mr. Serafini's e-mail on January 13th \*\*\***

Question: Please provide the emission for the technical data. Please submit an exhibit that describes Akela's intentions for equipment approval and how it will comply with the Part 15 UWB limits.

Response: The device operates by emitting a stepped sequence of pure tones from 2900-3600 MHz, 3 MHz apart. A complete cycle through all frequencies takes about 15.4 msec.

**Emission**

The CW bandwidth, measured while parked on a single frequency, is about 1 Hz.

In operation, the stepping action widens the bandwidth at each frequency to about 15.3 kHz. We suggest an emissions designator of 15K3N0N.

**Plans for equipment approval**

AKELA does not intend to seek approval under the Part 15 UWB rules.

Instead, the company plans to request a Part 90 waiver similar or identical to L-3 CYTERRA, Request for Waiver to Allow Certification and Use of Electromagnetic Motion Detection and Ranging Devices Operating at 3100-3500 MHz, WP Docket No. 09-2, Order, DA 09-2482 (released Nov. 25, 2009).

The waiver will seek to use the 3100-3500 MHz band, and possibly some spectrum to either side of that band. AKELA expects to file the waiver request within a few months, and will subsequently seek certification under Part 90 pursuant to the waiver.

**\*\*\* From Ghaffari's e-mail on January 14th \*\*\***

Question: It appears that one of the STAs applications is similar to pending file 0552-EX-PL-2010. Please indicate which application should be removed.

Response: All applications have been modified to clearly reflect operations that are distinct from one another. AKELA wishes to continue processing of 0205-EX-ST-2010 and 0221-EX-ST-2010. The STAs cover operations at 500-960 MHz. AKELA also seeks to continue processing of application 0552-EX-PL-2010 in frequency band 2900-3600 MHz.

Please feel free to call me if you have further questions about any of these applications.

- Raymond