NARRATIVE STATEMENT IN SUPPORT OF STA REQUEST

Pursuant to Sections 5.3 and 5.61 of the Commission's rules, 47 C.F.R. §§ 5.3, 5.61 (2016), AT&T Services, Inc. ("AT&T") hereby respectfully requests special temporary authority ("STA") beginning August 7, 2017, for the purpose of testing Licensed Assisted Access ("LAA") technologies and equipment. In support of this request, the following is shown:

1) Applicant's Name, Address, and Phone Number:

AT&T Services, Inc. 208 S. Akard St. Dallas, TX 75202 (214) 757-3357

2) Purpose of Operation and Explanation of Why an STA is Needed:

Grant of STA is needed for AT&T to conduct initial tests of prototype LAA equipment operating in the 5150-5250 MHz and 5725-5850 MHz bands while the FCC completes its review and processing of pending applications for certification of the equipment. The experimentation will allow AT&T to evaluate performance and determine customer acceptability during the development, design, and pre-production phases of the equipment and will facilitate the eventual widespread deployment of LAA.

The company does not propose to conduct marketing trials under the requested STA. None of the equipment is to be made available to members of the public, sold or leased or advertised for sale or lease. No service is to be offered under this experimental authority.

3) Time and Dates of Proposed Operation:

August 7, 2017 through February 7, 2018.

4) Class of Stations:

During this testing, AT&T will deploy temporary fixed stations operation in the unlicensed 5150-5250 MHz and 5725-5850 MHz bands.

5) Locations of Proposed Operations:

AT&T intends to conduct testing at up to eight locations in San Francisco and Indianapolis. The addresses and approximate reference coordinates for each location as currently proposed are listed in the table below. Fixed stations may also be operated intermittently at other locations within a 5-kilometer radius of the center coordinates specified in the accompanying application.

| Address | Latitude | Longitude |
|---------------------|-----------|-------------|
| 301 Pine Street | 37.791985 | -122.40155 |
| San Francisco, CA | | |
| 733 Front Street | 37.797848 | -122.3999 |
| San Francisco, CA | | |
| 724 Battery Street | 37.798124 | -122.40089 |
| San Francisco, CA | | |
| 60 Broadway | 37.798886 | -122.399506 |
| San Francisco, CA | | |
| 444 Battery Street | 37.795413 | -122.400318 |
| San Francisco, CA | | |
| 2345 Pine Street | 37.787677 | -122.434555 |
| San Francisco, CA | | |
| (two antennas) | | |
| 281 S. Capital Ave | 39.763086 | -86.161766 |
| Indianapolis, IN | | |
| 270 S. Illinois St. | 39.76301 | -86.160323 |
| Indianapolis, IN | | |

6) Equipment to be Used:

AT&T will use prototype Ericsson equipment that has not yet received FCC certification.

7) Frequencies Requested:

5150-5250 MHz and 5725-5850 MHz.

8) Maximum Effective Radiated Power:

4 Watts. All power levels will comply with the limits set forth in the FCC's rules, including those relating to human exposure to radiation.

9) Type of Emission, Modulation Technique, and Bandwidth Required:

W9W, TDD, 60 MHz

10) Overall Height of Antenna Structure(s) Above Ground:

| Address | Height Above Ground to Antenna Tip (meters) | Elevation of Ground at Antenna Site (meters) | Distance to Nearest Aircraft Landing Area (km) | Natural Formations or Man-Made Structures Shielding Antenna From Aircraft |
|---------------------|---|--|--|--|
| 301 Pine Street | 9.7 | 6.0 | 19.40 | Surrounding Buildings |
| San Francisco, CA | | | | |
| 733 Front Street | 9.7 | 2.9 | 20.10 | Surrounding Buildings |
| San Francisco, CA | | | | |
| 724 Battery Street | 9.7 | 6.0 | 20.10 | Surrounding Buildings |
| San Francisco, CA | | | | |
| 60 Broadway | 9.7 | 2.9 | 20.30 | Surrounding Buildings |
| San Francisco, CA | | | | |
| 444 Battery Street | 9.7 | 3.9 | 19.70 | Surrounding Buildings |
| San Francisco, CA | | | | |
| 2345 Pine Street | 9.7 | 48.7 | 19.60 | Indoor |
| San Francisco, CA | | | | |
| (two antennas) | | | | |
| 281 S. Capital Ave | 6.71 | 218.0 | 10.2 | Surrounding Buildings |
| Indianapolis, IN | | | | |
| 270 S. Illinois St. | 6.71 | 216.0 | 10.2 | Surrounding Buildings |
| Indianapolis, IN | | | | |

No antennas will be mounted in a fashion that will require approval under FAA and FCC rules and regulations. Although certain antennas will extend more than 6 meters above the ground, none will extend more than 6 meters above a building and all antennas will be either installed within a building or, if installed outdoors, shielded by existing manmade structures, such as surrounding buildings, so as to prevent any hazard to air navigation.

11) Protection Against Interference:

AT&T does not expect its proposed operation to cause harmful interference. In the unlikely event that AT&T receives a complaint of harmful interference, it will take immediate action to address the interference, including if necessary discontinuing its operations. To facilitate such action, if needed, the company has designated David Orloff, Director, RAN Product Introduction, to act as the "stop buzzer" for this test. Mr. Orloff's contact information is provided below.

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12) Public Interest Statement:

AT&T submits that issuance of experimental authority is in the public interest, convenience, and necessity. Grant of this application will allow AT&T to evaluate performance and determine customer acceptability during the development, design, and pre-production phases of the equipment and will facilitate the eventual widespread deployment of LAA.

13) Contact Information:

 a. <u>Stop Buzzer:</u> David Orloff
Director, RAN Product Introduction AT&T Services, Inc.
Telephone: (425) 896-4119
<u>do2669@att.com</u> b. <u>Company Contact:</u> Robert Vitanza Asst. Vice President - Senior Legal Counsel AT&T Services, Inc. 208 S. Akard St., Rm. 3031 Dallas, TX 75202-4206 Telephone: (214) 757-3357 <u>RV4902@att.com</u>

c. <u>Legal Representative Contact:</u> David Hilliard Wiley Rein LLP 1776 K Street, N.W. Washington, DC 20006 Telephone: (202) 719-7058 Facsimile: (202) 719-7049 <u>dhilliard@wileyrein.com</u>

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