

## Exhibit C

# Engineering Justification for Special Temporary Authority on Behalf of Adeunis NA, Inc.

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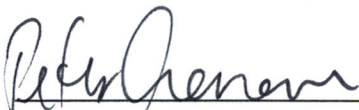
In the fall of 2013, Adeunis applied for and was granted an STA to operate its very low power portable radio system for referees employed by the Southeastern Conference (SEC). The primary user of the desired spectrum (900 - 901 MHz) being Sprint, I documented each of the stadium locations and received a Letter of Concurrence from Sprint to operate, which was submitted with last year's application.

The STA was successfully deployed, used for pre-game testing and functionally during all the games, and no interference was expected nor reported to any existing 900 MHz incumbent. Due to the success of this system, the SEC has again requested its use for the 2014 season. Also, the Big Ten Conference has contracted with Adeunis to use the radio system. Adeunis again requests spectrum on the uplink side of the 900 MHz PLMR band between 900 and 901 MHz. This time, however, the list of incumbents is much more diverse, so no letters of concurrence are sought. Rather, Adeunis asserts that the signals generated by its radios, with an ERP of only 200 milliwatts, and as limited by being within the stadiums, have no interference potential. Even if, *arguendo*, a same-frequency mobile from an incumbent system were to try to transmit to its associated base station on an affected frequency, its much stronger signal would easily overpower any fields generated by this proposal. That same hypothetical mobile would not be affected by the proponent, as the outbound incumbent transmissions are on 939.5 MHz. In fact, such a portable would be unlikely even to be able to be used within a stadium, as the average distance to a 900 MHz incumbent base station is more than 60 kilometers. At such distances, the proponent's system would be totally inaudible.

With an attenuation in the RF signal at 900.5 MHz created by the stadium structure of over 25 dB, a receiving incumbent base station would have to be situated within approximately one kilometer to be able to "see" any proposed transmission, and only then if it somehow had a direct line of sight into the stadium where the referees work.

There is no such incumbent at any of the proposed locations.

This narrative was prepared by the undersigned, whose credentials are a matter of record at the Federal Communications Commission.



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