# STATEMENT ACCOMPANYING REQUEST FOR EXPERIMENTAL AUTHORIZATION and REQUEST FOR EXPEDITIOUS CONSIDERATION

#### 1. Introduction

By this application for Special Temporary Authority, AeroVironment, Inc. (AeroVironment), requests that the Commission grant an experimental license to operate facilities within the 2085.5-2097.5 MHz and 2097.5-2109.5 MHz segments at a site, detailed in the attached application located at:

• Near 162 Echo Hill Lane, Washington, Rappahannock County, Virginia, mobile and airborne, 3.3 km radius, 152 m AGL, centered on NL 38° 42' 35" WL 78° 07' 53"

The testing and experiments are for the US Department of Defense (DoD), Defense Advanced Research Projects Agency (DARPA). AeroVironment has contractual agreements with DoD. AeroVironment is collaborating with the Mid-Atlantic Partnership of Virginia Tech University to perform the experiments. AeroVironoment is currently licensed on WJ2XFX to perform the experiments for this purpose at a site in Blacksburg, Virginia.

This application for Special Temporary Authority (STA) for a six month period is based on client agency request that the tests be performed in a location permitting wider participation of agency personnel. AeroVironment requests that the authorization commence July 16, 2018

The following presents a Request for Expedited Consideration, summarizes the testing proposed, the reasons underlying the effort and the technical parameters of the intended operations.

## 2. Request for Expedited Consideration

AeroVironment asks the understanding of the Commission and NTIA and other agencies. We recently learned of this request for testing at an additional location due to client agency requirements. We did not anticipate this requirement and ask for consideration so that we are able to accommodate it.

#### 3. Purpose and Technology

AeroVironment designs and manufactures small unmanned aircraft systems (SUAS) in support of US and allied Armed Forces. These systems are used by US military and allied forces to help establish intelligence, surveillance and reconnaissance superiority.

AeroVironment's SUAS DDL™ is a lightweight, low power, bi-directional, digital wireless video link. Compliant with the Small Unmanned Airborne Systems Digital Data Link (SUAS DDL) waveform, it enables enhanced command and control of small UAS. DDL is IP-based to enable flexibility and interoperability between small airborne and ground systems with

limited power availability and bandwidth to maximize the systems operating within an area. The primary frequency band supporting US DoD has been the 1780-1850 MHz segment.

The purpose of the experiments is to determine and examine interference between transmissions in the 2085.5-2097.5 MHz and 2097.5-2109.5 MHz band segments and an RF payload being tested on the aircraft. Radio performance and functional flight tests will be pursued. The experiments will replicate scenario-based environments to discern operational effectiveness and the degree refinements are needed to transceivers, antenna, emission designators, power source and the overall system. The testing will evaluate the technology's effectiveness in context of the RF payload.

## 4. Deference to Licensed Users

AeroVironment commits to operations respecting other users of the band and those in adjacent segments. The limited power levels are part of this commitment. The channels provide aircraft control and video and telemetry transmission from the aircraft to the ground. Time slots are dedicated for uplink data and a downlink.

AeroVironment commits to continued coordination with the Society of Broadcast Engineers' regional frequency advisor as to the 2025-2110 MHz band and to respect broadcast auxiliary operations.

## 5. Nature of Operations

Surface Based and Airborne Transmission

The DDL communications module will use band segments that are 4.68 MHz wide in the 2085.5-2097.5 and 2097.5 – 2109.5 MHz band segments for purposes of sending ground based command and control (C2) data to and from the SUAS and to transmit video and telemetry to the ground control station. The technology requires 4.68 MHz for a control channel. The channel will be divided in time between uplink (ground to air) C2 and downlink (air to ground) full motion video and associated metadata at 15 frames per second. Emission Designators are 4M68G7W and 1M56G7W, respectively, with a transmit power at 10W. Transmission control will be from the surface control station to the SUAS via a laptop, console, or tablet. AeroVironment's DDL system has been adopted by the US Army as the standard communications architecture for all small unmanned systems, including ground robots.

## 6. Stop Buzzer

Bart Decker, Flight Standards Director is available by telephone at (805) 391-1335 and will act as a "stop buzzer" if any matters involving interference arise during the testing.

# 7. Transmitting Equipment

The transmitting equipment is AeroVironment Transreceiver Models 75869 and 76778, with up to 5 units sharing the channel in a Time Division Multiple Access (TDMA) manner at the location proposed. It is not experimental.

#### 8. Antenna

The Antenna details are as follows:

Antenna	Gain	Polarization	Orientation in	Oriental in
	(Nominal)		Vertical Plane	Horizontal Plane
GCU Antenna ASY	9dbi*	Vertical	30	85
AeroVironment				
Stack Patch				
	2.9dbi	Vertical	78	360
Tailboom ASSY				
AeroVironment				
Dipole				

# \*Major Side Lobe

- E-Plane
  - Gain: +9 or +2 dbi
  - o 120 deg
- H- Plane
  - $\circ$  Gain: +9 or +2 dbi
  - 179 deg

## 9. Restrictions on Operations and Interference Protection

AeroVironment understands that experimental operations must not cause harmful interference to authorized facilities. Should any interference occur, AeroVironment will take immediate steps to resolve the interference, including, if necessary, discontinuing operations.

#### 10. Waiver of Station Identification Requirements

AeroVironment ask that its waiver of the station identification requirements stated in Section 5.115 of the Commission's rules remain in place.

# 11. **Diagram**

A diagram of the operations is provided in the Attachment as is the location of the proposed experiments.

# Conclusion

AeroVironment appreciates very much the Commission's and NTIA' and other agency consideration of this application.

Please call upon us if we can respond to any questions.

# Operations Diagram

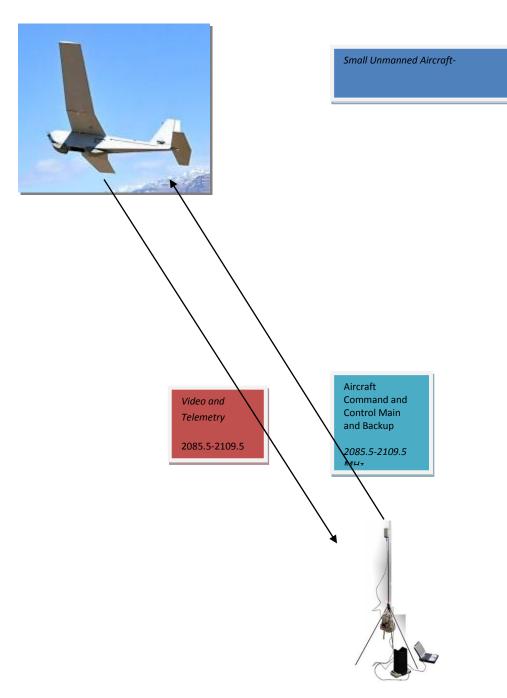


Figure 1 Simplified view of planned operations

# Location

Near 162 Echo Hill Lane, Washington, Rappahannock County, Virginia, mobile and airborne, 3.3 km radius, 152 m AGL, centered on NL 38° 42' 35" WL 78° 07' 53"

