

Description of Applicant Eligibility

As set forth in its accompanying Form 442, Apple Inc. respectfully requests authorization under the Federal Communications Commission's Program Experimental Radio License rules to conduct experiments at its Apple Park campus in Cupertino, CA.¹ Granting this application will promote innovation by enabling Apple to obtain engineering data relevant to the design and development of consumer radio frequency devices.

Apple meets each of the program license eligibility criteria set forth in Part 5 of the Commission's rules.² First, Apple has substantial experience managing the use of radio frequency spectrum. Apple is a leading designer and manufacturer of mobile communications devices, and has received over 500 certifications for radio frequency equipment. Apple devices access spectrum in numerous licensed and unlicensed frequency bands. For example, iPhones use spectrum ranging from 13 megahertz (contactless payments via Apple Pay) to 5 gigahertz (802.11ac Wi-Fi with MIMO) and support more than 18 different LTE bands.

Second, Apple has institutional processes in place to monitor and effectively manage a wide variety of research projects. These processes will include all experiments authorized subsequent to registration in the Experiments Notification System.

Finally, Apple will conduct all experiments authorized under its program license at facilities that are under Apple's exclusive control. Specifically, Apple requests authorization for a program license to enable experimentation at Apple's real-property facilities included within the polygon bounded by the following coordinates.³

Location	Geographic Coordinates (NAD83)
Apple Park / Vallco Parkway	37° 20' 15.33"N, 122° 0' 50.65"W
	37° 20' 15.37"N, 122° 0' 19.90"W
	37° 20' 2.55"N, 122° 0' 19.77"W
	37° 20' 2.50"N, 122° 0' 17.22"W
	37° 19' 33.75"N, 122° 0' 17.30"W
	37° 19' 43.24"N, 122° 0' 42.04"W
	37° 19' 34.15"N, 122° 0' 23.71"W
	37° 19' 31.78"N, 122° 0' 23.93"W
	37° 19' 23.73"N, 122° 0' 24.17"W
	37° 19' 23.70"N, 122° 0' 26.24"W
	37° 19' 25.41"N, 122° 0' 26.27"W

¹ Apple has submitted a separate program license application, File No. 0024-EX-PN-2018, for its Infinite Loop campus. See 47 C.F.R. § 5.304 (requiring separate program license applications for entities seeking "to conduct experiments in more than one defined geographic area").

² 47 C.F.R. § 5.302.

³ This polygon also includes an approximately 500-meter portion of Interstate 280, which traverses Cupertino. However, Apple is not seeking authority to operate on I-280, and will limit experiments authorized under the program license to its real-property facilities.

Location	Geographic Coordinates (NAD83) con'd
	37° 19' 25.31"N, 122° 0' 30.18"W
	37° 19' 28.54"N, 122° 0' 30.13"W
	37° 19' 32.60"N, 122° 0' 38.25"W
	37° 19' 32.78"N, 122° 0' 41.62"W
	37° 19' 48.31"N, 122° 0' 44.48"W
	37° 19' 51.61"N, 122° 0' 45.76"W
	37° 19' 55.23"N, 122° 0' 41.74"W
	37° 19' 58.44"N, 122° 0' 41.26"W
	37° 20' 2.31"N, 122° 0' 46.27"W
	37° 20' 3.37"N, 122° 0' 50.29"W

Figure 1: Apple Park / Vallco Parkway

