

From: Jeffrey Rummel

To: Leann Nguyen

Date: May 19, 2021

Subject: Request for Info - File # 0047-EX-CM-2021

Message:

File No. 0047-EX-CM-2021

Ref. 61546

Ms. Nguyen:

In reply to the inquiry below, please note the following:

Q1: "As Mobility Division requests, please provide the following information - With respect to the CBRS frequencies 3550-3640 MHz included in this coordination, WTB/Mobility Division requests that the applicant revises its filing by providing the following additional information: 1. Explanation of how it would coordinate any usage with a Spectrum Access System (SAS). 2. Explanation of how it would specifically avoid causing interference to incumbent and commercial operations in the band, including General Authorized Access (GAA)?"

BAE Systems Reply:

- BAE Systems has amended the pending application to modify the 2900-3640 MHz band to "2900-3549 MHz"; see Amended Modification
- Accordingly, it is BAE Systems's understanding that the information requested above will not be required, because the application no longer overlaps with the frequencies in question.
- Please let BAE Systems know if any additional information is required with respect to the above questions.

Q2: "With respect to authorization of operation in the 3700-4200 MHz band included in this coordination, WTB/Mobility Division requests additional information on how the applicant will avoid causing harmful interference to incumbent operators in this band, including FSS earth stations. A list of registered incumbent FSS earth stations in the band can be found at the following link: <https://docs.fcc.gov/public/attachments/DA-20-823A2.xls>"

BAE Systems Reply:

- BAE Systems has amended the pending application to modify the 3710-4200 MHz band to specify only 3 discrete frequencies: 3750 MHz, 4000 MHz, 4200 MHz; see Amended Modification
- With respect to the remaining discrete frequencies 3750 MHz, 4000 MHz, 4200 MHz, interference to incumbent FSS operations will be mitigated in light of the following factors:
 - o By limiting operations in the range to only 3 discrete frequencies - 3750 MHz, 4000 MHz, 4200 MHz; the large majority of the range will be unaffected by these operations
 - o Operations on these 3 frequencies are fixed only; no mobile operations and no radius of operations
 - o Operations on these frequencies are at relatively low lower (10W ERP)

- o BAE will confirm the list of incumbent FSS operators in the area and will commit to provide advanced notice to such incumbents of at least 24 hours prior to operations on these 3 frequencies, and will cease transmissions on these 3 frequencies upon any reports of interference
- o Testing will be sporadically planned and executed throughout the course of this license, typically for three to five days at a time at an expected frequency of once a month. Transmissions will typically only occur between the hours of 8AM and 6PM EST on weekdays.
- o The Stop Buzzers for this experiment (Serge Pouliot at 603-885-2449, George Moynihan at 603-689-8630; BAE Systems Emergency Services Center at 603-885-3842) remain available for any issues related to operation on these 3 frequencies
- BAE Systems is available to further discuss with the International Bureau any further interference mitigation issues it wishes to discuss

Please let us know if there are any further questions related to this inquiry.

Best regards,

Jeff Rummel
Attorney for BAE Systems

Jeffrey E. Rummel
Partner

Arent Fox LLP | Attorneys at Law
1717 K Street, NW
Washington, DC 20006-5344
202.715.8479 DIRECT | 202.857.6395 FAX
jeffrey.rummel@arentfox.com | www.arentfox.com