

From: Jeff Rummel

To: Leann Nguyen
Date: March 02, 2021

Subject: Request for Info - File # 0283-EX-CM-2020

Message:

File No. 0283-EX-CM-2020
(Ref. 59375 and 59418)

Ms. Nguyen:

FAA coordination for the 228.8-328.6 MHz range has been completed, for the 99 discrete frequencies specified in Exhibit 1 to pending File No. 0283-EX-CM-2020.

See attached FAA Concurrence under TRK 210157 - NG T210154.

See the following comment included in the coordination:

COMMENTS: PLEASE ADD A CONDITION IN THE FCC LICENSE INDICATING THAT NO FREQUENCIES ALLOCATED FOR AIR TRAFFIC CONTROL PER LIST PROVIDED BY THE FAA WILL BE USED IN THIS FREQUENCY RANGE.

Also – please note that FAA agreed to coordinate the 99 discrete frequencies under a single NG T number.

Accordingly, as described in the prior email below dated 2/10/2021, BAE Systems understands that it will not be necessary to amend the application to list each of the 99 frequencies. However, please let us know if the Commission has contrary instructions.

Best regards,

Jeff Rummel
Attorney for BAE Systems

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From: Rummel, Jeffrey
Sent: Wednesday, February 10, 2021 7:36 PM
To: Leann Nguyen
Cc: Carvajal, Lorena (FAA) ; Moynihan, George (US)
Subject: BAE Systems - Reply to Inquiry re: 99 Specified Frequencies within 228.8-328.6 MHz - File No.

0283-EX-CM-2020 (Ref. 59418)

File No. 0283-EX-CM-2020
Ref. 59418

Ms. Nguyen:

Thank you for your message below regarding the 99 discrete frequencies specified by BAE Systems within the 228.8-328.6 MHz range.

In reply to your inquiry, please note the following:

Q: "Because 99 discrete frequencies would have 99 separate NG records on the system, BAE company must enter each frequencies on the application."

A.

- BAE Systems has discussed this with the FAA's Lorena Carvajal (who is cc'd on this message) in order to avoid overburdening the agency review process for these 99 frequencies.
- Ms. Carvajal has confirmed that "from the FAA's perspective - FAA will be able to coordinate the requested discrete frequencies without requiring 99 separate NG records and without each frequency having to be listed on the application.
- Therefore, at Ms. Carvajal's direction, BAE Systems is preparing to submit in the near future a single FAA coordination request to FAA for the entire 228.8-328.6 MHz range "and FAA will then conduct a coordination for each of the specified discrete frequencies.
- Based on the above, and in order to conserve the resources of all agencies involved, BAE Systems understands that it will not be necessary to amend the application to list each of the 99 frequencies.
- However, please let us know if the Commission still would like BAE Systems to amend the application to include each of the 99 frequencies.

Q: "BAE company needs to provide what is specific military contract number and a military POC that requests for 99 MAG discrete frequencies and verify the reason to use the requested frequencies."

A.

- The following contract generally requires transmission within the 228.8-328.6 MHz range (among other frequency ranges), in order to characterize antenna performance for items provided to our customer.

FA8620-19-C-2009

- The POC for the above contract who can verify the need for operation within that range is as follows:

POC for FA8620-19-C-2009 = Erica Grudich
Contracting Officer
Section Chief, MQ-9 FMS Contracting

AFLCMC/WIIK
937-713-3646 Office
937-238-0128 Telework
Erica.grudich@us.af.mil

- Please note that the testing protocols for these contracts generally require transmission within 228.8-328.6 MHz. In the pending modification application, BAE Systems has voluntarily proposed to limit its operation within that range to the 99 specified frequencies in order to minimize traffic in the band, and to comply with the FAA's requirement in Special Condition 24 to avoid transmissions on the Air Traffic Control frequencies in that range. BAE Systems assumes that limiting operation to these discrete frequencies is preferable to operating throughout the range, but if that is not correct please let us know.
- Finally, BAE Systems notes that it has operated within this range since the grant of the original license in 2011, with no incidents or problems, or reports of any interference.

Best regards,

Jeff Rummel
Attorney for BAE Systems

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