

**COMTECH SYSTEMS, INC.
EXPERIMENTAL STA APPLICATION
CALL SIGN: WE9XID
FILE NO. 0486-EX-ST-2010
October 2010**

**REQUEST FOR EXTENSION OF SPECIAL TEMPORARY AUTHORITY
& REQUEST FOR EXPEDITED PROCESSING**

Consolidated Response to Questions 4 and 5.

Comtech Systems, Inc. ("Comtech") hereby requests an extension of the Special Temporary Authority ("STA") previously obtained under FCC File No. 0236-EX-ST-2010,¹ to conduct additional experimental testing of its Transportable Fast Link Antenna ("TFLA"). Due to unexpected developmental difficulties, Comtech requires STA to allow testing in order to mate the new TFLA feed support assembly with the updated Aerial Oy feed. Comtech will also be field testing the TFLA unit to verify compatibility with a new reflector unit from Pacific Radome. This additional testing is necessary to meet the requirements and specifications of the United States Marine Corp. The additional experimental testing would occur as soon as October 7, 2010 and would be completed in approximately two weeks. Given, the short timeframe to finalize testing, Comtech is hereby requesting expedited processing of this STA request so that the final TFLA units can go into production for its order with the United States Marine Corp.² The experimental testing requested herein is critical to the TFLA system and the proposed experimental demonstrations as referenced in the currently pending STA request under File No. 0467-EX-ST-2010.

As noted in the previous STA requests, Comtech will utilize three frequencies in the range of 4.4 – 4.94 GHz (low, middle, high) on a temporary basis to conduct this critical testing to be done at the Comtech facilities located in Orlando, Florida. Only one frequency would be utilized at any given time during the testing.

Given the extremely low transmitting power level, Comtech believes that no harmful interference to any FCC licensees will occur. However, to the extent necessary Comtech will use its best efforts to avoid and minimize any potential interference. Comtech further recognizes that if any interference to existing licensed stations occurs, any testing will be subject to immediate shut down. Because the equipment is technically incapable of providing station identification, Comtech respectfully requests a waiver of the station identification provisions of Section 5.115 of the Commission's rules, 47 C.F.R. § 5.115.

All network traffic will be simulated traffic only, solely for evaluation purposes and not for the purpose of providing network data communications services to user stations.

¹ On May 6, 2010 Comtech filed an experimental Special Temporary Authority request (**File No. 0236-EX-ST-2010**) to conduct experimental testing of its Transportable Fast Link Antenna ("TFLA") in order to further test the antenna feed and measure the receive characteristics of its antenna unit currently in development. This request was approved by the Commission on May 13, 2010 under call sign **WE9XID** and expired June 18, 2010.

² On September 22, 2010 Comtech filed an additional STA request (**File No. 0467-EX-ST-2010**) to allow related experimental testing of the TFLA units to demonstrate to the US Marine Corp that the system meets contract requirements. That request is currently pending before the FCC.

Comtech submits that a grant of an experimental STA is necessary and in the public interest because it will allow Comtech to facilitate its order with the United States Marine Corp.

The **stop buzzer contact** for this project is Paul Kelly at Comtech, tel: (407) 854-1950 ext. 3050, mobile: (321) 948-4315, e-mail: paul.kelly@comtechsystems.com

Request for Expedited Processing

Comtech hereby requests that the above-captioned application be processed on an expedited basis because the proposed TFLA equipment subject to the testing requested herein has been ordered by the United States Marine Corp and will be ultimately be deployed to troops in Afghanistan. As previously noted, further testing is necessary to mate the new TFLA feed support assembly with the updated Aerial Oy feed. Comtech will also be field testing the TFLA unit to verify compatibility with a new reflector unit from Pacific Radome. Comtech is scheduled to conduct experimental demonstrations with the United States Marine Corp,³ which has ordered the TFLA units with a short delivery schedule and will deploy these units in Afghanistan. Due to the changes, the testing requested herein must be completed quickly so that the final TFLA units can go into production for this order.

Expedited processing of the Comtech application is therefore a matter of serious national security and will advance the declared war on terror. Failure to process the application on an expedited basis would disserve the public interest by delaying the testing and deployment of powerful new communications equipment to the United States military. For all of these reasons, Comtech respectfully requests expedited processing of the application, and a decision concerning the application as soon as possible.

³ See STA request, File No. 0467-EX-ST-2010