

**COMTECH SYSTEMS, INC.
EXPERIMENTAL STA APPLICATION
CALL SIGN: WE9XID
FILE NO. 0588-EX-ST-2010
DECEMBER 2010**

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

Consolidated Response to Questions 4 and 5.

Comtech Systems, Inc. ("Comtech") hereby requests short term Special Temporary Authority ("STA") to conduct necessary experimental testing of its Transportable Fast Link Antenna ("TFLA") at its facility located in Orlando, Florida. The short term testing proposed herein is contractually required under its TFLA contract with the United States Marine Corp, and is critical to Comtech's efforts in fulfilling its order with the United States Marine Corp.

On December 9, 2010 Comtech filed a similar request with the Commission under File No. 0572-EX-ST-2010 requesting testing dates between December 15, 2010 to December 17, 2010. That request was dismissed by a Commission Letter on December 16, 2010, noting- *"You are advised that the Commission is unable to grant your application for the facilities requested. Your application was filed with a short notice and did not permit enough time for review and the necessary NTIA coordination."*

With this STA request, Comtech has selected a **projected** date range of December 31, 2010 to January 7, 2010. However, given the urgency of the testing as it relates to its order with the US Marine Corp, Comtech would like to begin the required testing as soon as possible. If the Commission is unable to coordinate and process the application earlier than or within the requested timeframe noted above, **Comtech respectfully requests that this STA request not be dismissed and that the Commission act on the application as promptly as it possibly can.** As is further explained below, Comtech only requires a 24 hour period to complete the requested testing, but cannot schedule said testing until Commission authorization is obtained.

Background

On September 22, 2010 Comtech filed an experimental STA request under File No. 0467-EX-ST-2010, seeking authority to conduct experimental testing of its TFLA system to demonstrate the system meets the technical specifications as contained within its contract with the US Marine Corp. That request was granted by the Commission for the period of October 20, 2010 through April 21, 2011, and authorized testing at locations in Orlando, Florida, Huntsville, Alabama, and Silver Springs, Nevada. The frequencies authorized by the Commission were 4400 MHz, 4700 MHz, and 4935 MHz with an output power of 20 mW and an ERP of 2.0 Watts. **Comtech will continue to utilize this STA through the ending term.**

As noted above, Comtech requires short term STA so that it can conduct additional experimental testing of the TFLA system at its Orlando facility to comply with contractual requirements for its customer, the United States Marine Corp. As referenced in previous STA filings for related TFLA testing¹, these units will be ultimately be deployed by the United States Marine Corp to troops in Afghanistan, adding to the urgency to perform the requested testing.

The current testing proposed herein mirrors that as previously granted by the Commission under File No. 0467-EX-ST-2010, with the exception of a higher requested power level. Also, authority is not currently sought for testing at the Huntsville, Alabama and Silver Springs, Nevada locations² as authorized under that STA.

Comtech proposes to conduct the experimental testing with an output power of 2000 Watts (W) and a transmitting ERP of 20.0 Megawatts (MW). The required testing will not go beyond a twenty-four hour period. As noted above, a **projected** date range of December 31, 2010 to January 7, 2010 has been entered into this STA request to allow test development/planning, but cannot schedule the testing until Commission authorization is obtained.

Comtech has selected the frequencies previously authorized by the Commission, namely 4400 MHz, 4700 MHz, and 4935 MHz to conduct this testing. Comtech will only require and utilize one of these three frequencies to conduct the short term testing and hereby requests that the Commission allocate one of these three frequencies on any Special Temporary Authorization.

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.

Comtech submits that a grant of an experimental STA is necessary and in the public interest because it will allow Comtech to finalize its order with, and allow deployment by, the United States Marine Corp., thus advancing national security efforts.

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

¹ See FCC File Nos. 0163-EX-ST-2010, 0236-EX-ST-2010, and 0467-EX-ST-2010

² In the future Comtech will require similar short term Special Temporary Authority for testing at these locations and will seek Commission authorization for such testing when more accurate timelines materialize.

Request for Expedited Processing

Comtech hereby requests that the above-captioned application be processed on an expedited basis because the TFLA equipment subject to the testing requested herein has been ordered by the United States Marine Corp and will ultimately be deployed to troops in Afghanistan. As noted within the STA request, Comtech is contractually obligated to perform a short term test of its TFLA equipment at a higher power level to demonstrate compliance with the specifications of the United States Marine Corp. The United States Marine Corp has ordered the TFLA units with a short delivery schedule and will deploy these units in Afghanistan. Delays in the testing requested herein would ultimately delay the ability of the United States Marine Corp to procure and implement the TFLA units to troops in Afghanistan.

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.