

**EXHIBIT**

**Introduction**

By the instant application (“Application”), DRS Advanced ISR, LLC (f/k/a DRS ICAS, LLC) (“DRS Advanced ISR”) requests that the Commission grant an experimental license (“License”) to permit DRS Advanced ISR to operate the facilities specified in the Application. DRS Advanced ISR is a limited liability company.

**Purpose of the Operation**

The License at and around DRS Advanced ISR’s Milford Antenna Test Range is required to permit DRS Advanced ISR to test the functionality of its radio direction finding and collection systems. Grant of the License would provide DRS Advanced ISR with the ability to transmit test signals in the authorized bands to verify the efficacy of our signal detection and location systems.

The Application seeks Commission consent for continuation of the transmissions currently authorized under File No. 1363-EX-ST-2015 (WI9XUB), which would be moved from DRS Advanced ISR’s Merrimack Test Range to the Milford Antenna Test Range due to the closure of the former facility. Accordingly, as reflected in File No. 0369-EX-ST-2016 (WI9XUB), DRS Advanced ISR intends to enlarge the transmissions’ Radius of Operation from 20 km to 30 km to accommodate operations at the new facility. No other modifications of the transmissions’ technical specifications will occur.

Currently, no government contract is associated with the desired transmissions. However, DRS Advanced ISR will advise the Commission should the transmissions become associated with a government contract.

Waiver of the Station ID rules set forth in Section 5.115 of the Commission’s rules is respectfully requested.

**Prevention of Interference**

DRS Advanced ISR is well aware of its obligations under Part 5 of the Commission’s rules to avoid interference to co-channel licensees in non-experimental services, and will take all necessary steps to ensure compliance with its obligation. In this regard, DRS Advanced ISR notes that for this experiment, the company spectrally analyzes its emissions as part of the testing, and would recognize if a transmitter was broadcasting improperly.

**DRS Advanced ISR, LLC (f/k/a DRS ICAS, LLC)**  
**FCC Form 442 – Application for New Experimental Radio Station**  
**File No. 0220-EX-PL-2016**

**Stop Buzzer**

DRS Advanced ISR advises that the following individual will be available by wireless telephone, and will act as a “stop buzzer” if any issues regarding interference should arise during testing:

Jamie Golden: (603) 320-8669

**Denial of Applications**

DRS Advanced ISR hereby advises the Commission that it an application for an experimental license was denied or dismissed in the following three instances:

1. File No. 3020-EX-ST-2010: On March 30, 2011, the Commission dismissed DRS Advanced ISR’s application for experimental authorization at DRS Advanced ISR’s own request.<sup>1</sup>
2. File No. 0140-EX-ST-2012: On March 15, 2012, the Commission dismissed DRS Advanced ISR’s application for experimental authorization. The FCC stated that the application was dismissed because DRS Advanced ISR was not permitted to access the XTAR-LANT satellite located at 30W – as proposed in the application – since the facility’s usage was restricted to military operations.<sup>2</sup>
3. File No. 1362-EX-ST-2015: On January 7, 2016, the Commission dismissed DRS Advanced ISR’s application for experimental authorization on the grounds that the application was an erroneous duplicate of File No. 1363-EX-ST-2015.<sup>3</sup>

Each of the above-referenced applications were dismissed without prejudice. Accordingly, DRS Advanced ISR hereby submits that a Commission decision to approve the instant Application and grant the License requested herein should in no way be hindered by the FCC’s previous dismissals of the above-referenced applications. DRS Advanced ISR is aware of the application requirements for experimental authorizations, and submits that the instant Application is compliant with all relevant Commission rules and regulations.

**Conclusion**

For the foregoing reasons, DRS Advanced ISR, LLC (f/k/a DRS ICAS, LLC) respectfully submits that approval of this Application is in the public interest, convenience, and necessity.

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<sup>1</sup> Letter from James R. Burtle, Chief, Experimental Licensing Branch, Federal Communications Commission, to Ira Krowitz, DRS ICAS, LLC at 1 (Mar. 30, 2011).

<sup>2</sup> Letter from Walter Johnston, Chief, Electromagnetic Compatibility Division, Federal Communications Commission, to Ira Krowitz, DRS ICAS, LLC at 1 (Mar. 15, 2012).

<sup>3</sup> Letter from Nnake Nweke, Chief, Experimental Licensing Branch, Federal Communications Commission, to Katherine Krebel, DRS ICAS, LLC at 1 (Jan. 7, 2016).