

DESCRIPTION OF RESEARCH PROJECT

Datron World Communications, Inc. ("Datron") hereby submits two applications, both of which seek experimental authorization designed to permit Datron to test equipment that it manufactures for a variety of customers charged with protecting the homeland security of the United States, including the Federal Bureau of Investigation ("FBI"), the National Guard, and the United States Army, as well as several other critical Federal, state and local government entities. Two applications are submitted because Datron has listed all of the frequency assignments on a single application that may require coordination through the Interdepartmental Radio Advisory Committee ("IRAC") (those frequencies that are principally assigned by the National Telecommunications and Information Administration ("NTIA")), while the remaining application seeks the use of frequencies generally assigned by the Federal Communications Commission ("FCC"). While Datron is hopeful that both applications can be processed and granted quickly, it expects that the application which lists frequencies assigned by the FCC can be processed without any delay.

Datron has held an authorization to conduct these tests for most of the past twelve (12) years under the call sign WA2XO2; by the attached applications Datron seeks to replicate that authority (although Datron seeks to add an emission designator not contained on its previous application). Datron used its previous authorization in the same manner it proposes to use the requested licenses -- to test equipment. There will be no change in the proposed operations -- whether in frequency of use, power level or otherwise -- from the manner by which Datron used the requested channels in the past. The Commission will note that Datron has requested frequencies in various bands between 2 MHz and 76 MHz. It is critical that Datron be able to use frequencies throughout these bands to test the equipment it produces and ships to its customers. Because of the nature of Datron's customers, its equipment must be fully tested before it is shipped. The equipment operates in a variety of bands and therefore must be tested in those bands before it is put in the field to undergo operations, frequently in life-or-death situations. While it is important that Datron have access to a variety of frequencies throughout the bands 2 MHz to 76 MHz, it is not necessary that it has access to the precise frequencies specified in the application. Datron chose those frequencies based on its past use of those channels and its understanding that those frequency assignments are generally free of traffic. However, Datron does not object if the FCC or NTIA selects alternative frequency assignments throughout the bands if there are other frequency assignments less susceptible to use by other entities.

Finally, the FCC will note that Datron requests use of the proposed equipment with 1000 watts effective radiated power (and 125 watts output power). Despite the apparently high ERP requested, Datron does not believe that it poses a threat of harmful interference to licensed users. First, as noted above, it specifically selected frequencies it believes are not regularly used by other entities (although, as Datron notes, it is willing to use alternative frequencies in the same

bands if required). Second, although Datron requests use of the equipment with 1000 watts ERP, it generally tests equipment using lower ERP. Third, when Datron tests outside of its factory, the non-fixed units are operated in a remote desert area east of San Diego, California, where there are unlikely to be co-channel licensees. Third, the use of these frequencies will be, at most, episodic. Because of the nature of Datron's pre-operational equipment tests, the frequencies are used for only a few minutes at a time for a few hours a day -- when the tests occur. Some of the testing occurs in the controlled environment of Datron's factory, where the FCC can easily determine the source of any interference, in the unlikely event that Datron produces any. The testing outside the factory occurs only approximately 30 days a year (and, like testing in the controlled factory environment, for only a few minutes at a time for a few hours of the day). Finally, in the many years that Datron has held an experimental authorization for these frequencies, it has never been contacted by the FCC or otherwise based on interference to co-channel licensees.

Based on the foregoing, Datron requests that the FCC process the two applications promptly so that it may continue to test equipment for its critical clients. If there are questions regarding this application, the FCC is asked to contact communications counsel for Datron, Russell H. Fox of Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C. at 202.434.7483 or rfox@mintz.com.