

From: Allen Wooten

To: Nimesh Sangani

Date: October 07, 2019

Subject: Additional Information Request

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Message:

Pending File Nos. 0257-EX-CM-2019 (Ref. 51063); 0259-EX-CM-2019 (Ref. 51065)

Dynetics appreciates the Commission's inquiry, and assures the Commission that the locations currently specified on the license and requested in this modification application are required to support the underlying DARPA program and the operations required by it.

#### The Program

- By way of background, this is to confirm that the license supports DARPA Mobile Force Protection (MFP) program, which is a research and development program whose goal is to develop technology to counter the proliferation of small, unmanned aircraft systems (UASs). As such, this program is a key component of national security and the program schedule is of paramount importance. As previously explained in a prior reply, this experimental license is not intended, nor will it be used, to be used to market and sell the transmitting equipment authorized in the license.

#### Need for Multiple Sites and Generally

- The historical licensing of multiple transmitting sites under this license has not been performed at the discretion of Dynetics, but rather has been required by the requirements of the DARPA program. The DARPA MFP program has high visibility within DARPA and is a multi-phase program with high dynamics. Each program phase has used different combinations of test ranges for various tests - these test ranges and locations within those test ranges have been, and still are, driven by DARPA decisions driven by the specific test scenarios and other stakeholder requirements.

- Proving the MFP concept requires operations on a test range. Unfortunately, no test range will guarantee or reserve far in advance range availability when the MFP schedule requires these operations. This uncertainty associated with range availability results in a significant schedule (and cost) risk to the program and national security. Therefore, Dynetics has been directed by DARPA to mitigate this probable schedule risk by acquiring in advance FCC experimental licenses at all potential test ranges such that when range time is required by the schedule, a test range somewhere, with spectrum access, would likely be available.

- The locations currently on the license have evolved and solidified over time through continuous program schedule refinement and pre-test coordination discussions with DARPA and the test ranges, resulting in the prior modifications of the license.

#### Need for the Additional Requested Eglin AFB Location in this Modification Application

- For Phase II of the program, per the direction of DARPA, Dynetics was required to operate at the original Eglin AFB ground and airborne locations specified on the license.

- While operation at the original Eglin AFB location will still continue to be required at DARPA's discretion, now that Phase III of the program is occurring, DARPA's test lead has requested the addition of the new Eglin AFB location specified in this modification application, and such new location is intended to be used for the major test events during Phase III.

- Dynetics apologizes for any impact to the Commission resulting from the various modification applications that have been filed for this license historically. However, Dynetics assures the Commission that the currently requested new Eglin AFB location is indeed being required by DARPA and Dynetics must timely respond to this requirement. In the short-term, Dynetics respectfully requests that this new Eglin AFB location be approved to allow the company to be appropriately responsive to this new requirement. In the long-term, however, Dynetics is willing to work with the Commission to reduce future filing/administrative burdens associated with the operations under this license, including for example the following approaches:

- o If it would assist the Commission administratively, Dynetics would be willing to “combine” the existing Eglin AFB operations on the license with the newly requested Eglin AFB operations by choosing new centerpoint coordinates between the 2 locations, and revising the radius of operations to 25 km, and thereby not adding to the total number of authorized locations on the license. This approach would encompass both locations (one of the west side and one of the east side of EAFB). Please let us know if this is preferred by the Commission.

- o If it would assist the Commission administratively, after the new Eglin AFB location is approved by the Commission, Dynetics would be willing to file a separate application for nationwide authority which – if granted with the required parameters – would replace the existing license.