#### **NARRATIVE STATEMENT**

Pursuant to Section 5.3(j) and Section 5.61 of the Federal Communications Commission's ("FCC") rules, Echodyne Corp. hereby respectfully requests a special temporary authority ("STA") from September 25, 2019 to March 24, 2020 to operate in the 24.45-24.65 GHz band to test its EchoGuard radar.

In support of this request, the following is shown:

### A. Purpose of Operation and Need for Special Temporary Authority:

The EchoGuard radar has received equipment authorization from the FCC (FCC ID 2ANLB-MESASSR00053). However, Echodyne requests this STA to allow it to conduct temporary demonstrations and testing for research and development purposes. The STA is for demonstrations and testing only and not for permanent installation of the radars. The demonstrations and testing under the STA will be related to radiolocation applications.

# B. <u>Location of Proposed Operation</u>:

Echodyne proposes to test the radars on the ground. The units will be fixed during operation, but may be tested at multiple fixed locations within the areas described below in order to test different configurations and concepts of operation.

Location	Coordinates (NAD83)	Radius of Operation
Middleburg Heights, OH	41° 21' 9" -81° 48' 59"	1 km
Boise, ID	43° 25' 0" -116° 29' 30"	30 km

### C. <u>Technical Specifications:</u>

#### 1. Frequencies Desired

Echodyne requests authorization to operate in the 24.45-24.65 GHz band.

#### 2. Effective Radiated Power

The units to be deployed operate at a peak maximum transmitter power output of 3.2W, and a peak maximum effective radiated power of 246W.

Echodyne will reduce the actual powers to the minimum power needed for successful operation, based on set-up and testing at the proposed locations. Operations will be conducted to comply with rules relating to human exposure to radiation.

#### 3. Modulation and Emissions

The EchoGuard radar operates using linear FM modulation. The emission designator is 45M0FXN. The emissions will not extend beyond the frequency bands requested.

### 4. Antenna Information

No antennas will be mounted in a fashion that will require approval under FAA and FCC rules and regulations.

# 5. Equipment To Be Used

Echodyne will conduct its testing with a maximum of 4 units.

### D. Protection Against Causing Interference:

As noted above, Echodyne has requested authority to operate in the 24.45-24.65 GHz band. It has conducted a search of the Commission's Universal Licensing System ("ULS") database and determined that there are no licensed operations in that spectrum.

In the event that it receives a complaint of harmful interference resulting from the proposed operation, Echodyne will take immediate action to address the interference, including if necessary discontinuing it operations. The company has designated Ms. Mo Swanson, whose contact information is provided below, to act as the "stop buzzer" for this purpose.

Furthermore, the length of the test period is short and the proposed operations will be limited in scope. Echodyne will on average transmit for only 240 minutes over a period of 8 hours on not more than 5 days each week.

In summary, the analysis conducted by Echodyne indicates the proposed operation should not interfere with any licensed operation.

### **E.** Restrictions on Operation:

Echodyne recognizes that the operation of any equipment under experimental authority must not cause harmful interference to authorized facilities. Should interference occur, Echodyne will take immediate steps to resolve the interference, including if necessary arranging for the discontinuance of operation.

In addition, Echodyne will advise entities using the equipment that permission to operate has been granted under experimental authority issued to Echodyne, that such operation is strictly temporary, and that the equipment may not cause harmful interference.

### F. Public Interest:

Grant of an authorization will permit Echodyne to refine its innovative radar equipment and enhance public safety.

# G. <u>Contact Information</u>:

For questions, please contact:

Andrea Radosevich General Counsel Echodyne Corp. 12112 115<sup>th</sup> Ave NE Kirkland, WA 98034 (206) 399-9793 andrea@echodyne.com

In the unlikely event interference concerns should arise during the period of authorization requested by this application, please contact the company's "Stop Buzzer" identified below:

Mo Swanson Echodyne Corp. 12112 115<sup>th</sup> Ave NE Kirkland, WA 98034 (410) 812-6340 mo@echodyne.com