

Exhibit 1: Narrative Statement

GOJO Industries, Inc. (“GOJO”) develops skin health and hygiene solutions, including PURELL™ advanced hand sanitizer and SMARTLINK™ electronic monitoring systems. GOJO’s SMARTLINK systems help facilities prevent the spread of infection by combining soap and sanitizer deployments with real-time monitoring tools to track hand hygiene compliance and maintenance status of dispensers (*e.g.* dispenser refill status and battery life).¹ These systems include devices that transmit under Part 15 of the Commission’s rules.²

GOJO respectfully requests that the Commission grant its application for experimental authorization with the operating parameters set forth in GOJO’s accompanying Form 442 in order to obtain data relevant to additional potential applications for unlicensed transmitters in the 2.4 GHz band. GOJO will deploy devices for field testing in existing customer facilities, and intends to use the resulting data to help provide future enhancements to SMARTLINK, including support for additional SMARTLINK device form factors and smart building / smart restroom applications.

¹ See GOJO INDUSTRIES INC., *Electronic Monitoring Systems*, <http://www.gojo.com/en/Electronic-Monitoring-Systems>. See also GOJO SMARTLINK, *Smart Technology. Smarter Service. How Hand Hygiene Dispenser Data can Impact Productivity, Waste, and Satisfaction* (Mar. 17, 2017), available at <http://www.gojo.com/~media/GOJO%20Site/Markets/Electronic-Monitoring-Systems/Hand-Hygiene-Hub/Files/Altavita-Case-Study.ashx>; GOJO SMARTLINK, *Implementing Electronic Hand Hygiene Compliance Monitoring* (June 20, 2017), available at http://www.gojo.com/~media/GOJO%20Site/Markets/Electronic-Monitoring-Systems/Files/Hanover-Case-Study-Implementing-Electronic-Hand-Hygiene-Compliance-Monitoring_V2_6_2017.ashx.

² See, *e.g.*, GOJO INDUSTRIES, INC., Part 15 Low Power Communication Device Transmitter, FCC ID: O76-T4SG0910A. GOJO also makes use of unlicensed modular transmitters manufactured by third parties.

The proposed operations are highly unlikely to result in harmful interference.³ First, operations will be limited to the 2.4 GHz ISM band, and will comply with the operating requirements in 47 C.F.R. § 15.247. As the Commission has recognized, devices that operate pursuant to Part 15 are unlikely to interfere with licensed services.⁴ Transmissions also will operate at far lower power than authorized under Section 15.247, and comply with industry standards for Wi-Fi and Bluetooth operations, including the applicable politeness protocols in those standards. Thus, from an RF perspective, the transmissions will be no different than those from Wi-Fi and Bluetooth-enabled devices that are already widely deployed today.

In addition, the proposed operations will be confined to indoor deployments on private property. As a result, signal attenuation as a result of distance and building materials will reduce the likelihood of harmful interference even further. Consistent with the requirements in 47 C.F.R. § 2.805(d)(2)(ii), GOJO also intends to label devices with the wording set forth in 47 C.F.R. § 2.803(c)(2)(iii) and retrieve the devices upon completion of testing.

Finally, as noted on its Form 442, the transmitting equipment GOJO intends to use is incapable of station identification. Accordingly, GOJO respectfully requests that the Commission exempt this authorization from the station identification requirements in 47 C.F.R. § 5.115.

³ See 47 C.F.R. § 5.84 (setting forth Part 5 non-interference criterion).

⁴ Indeed, the Commission's rules permit operation of Part 15 RF devices prior to equipment authorization without an experimental license in certain circumstances, including "[e]valuation of performance and determination of customer acceptability, during developmental, design, or pre-production states." See 47 C.F.R. § 2.805(d)(2)(ii).