

From: Catherine Wang

To: Doug Young

Date: November 06, 2020

Subject: Request for Info - File # 0854-EX-CN-2020

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Message:

QUESTION: Submit a justification for the large number of units.

RESPONSE: Over 3,500 Garmin International (Garmin) employees occupy the Olathe, Kansas site of the proposed re-radiator system in Application No. 0854-EX-CN-2020, which serves as the global headquarters and principal research and development hub for the company. Given the unparalleled diversity of GPS-enabled products that Garmin develops and manufactures (see Exhibit A to the instant application for additional information), hundreds of individual engineers and/or engineering teams are working in parallel on product research and development activities in the Office Tower on Garmin's Olathe campus. The number of units requested is not excessive based on the large number of Garmin engineers, designers, and product development teams at this location that need to access a reradiated signal to perform their functions efficiently. The proposed re-radiator system will give these engineers and engineering teams access to a re-radiated GPS signal on-demand as needed in select offices, work stations, and laboratories within the Office Tower, which will improve efficiency by preventing engineers from competing for access to a re-radiated GPS signal in a small number of designated anechoic chambers, or, alternatively, from having to work outside exposed to the elements to directly receive a GPS signal. Approval of a smaller number of units would harm Garmin's efficiency, undermine its continuing ability to innovate, and leave Garmin at a meaningful disadvantage in the future vis-à-vis foreign competitors conducting intensive research and development in other jurisdictions. Please also be aware that because many of Garmin's products are compact handheld or body-worn devices with built-in antennas, the use of a conducted signal is impractical when evaluating and debugging a prototype under test.