

**William W. Weiss**

Vice President & General Manager

May 20, 2015

Mr. Julius Knapp  
Chief Engineer  
Office of Engineering and Technology  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Subject: Request for Experimental License; File No. 0258-EX-PL-2015 (Orlando, FL)

Dear Mr. Knapp:

General Dynamics C4 Systems ("General Dynamics") respectfully requests that the Federal Communications Commission ("FCC") allow operation in the 700MHz Public Safety spectrum with Long Term Evolution ("LTE") equipment and devices at the General Dynamics facility at 12001 Research Parkway Suite 500, Orlando FL 32826, in conjunction with the manufacturing, integration, and test of Band Class 14 equipment. We specifically seek authority to use the 700 MHz Band 14 spectrum, 758-768/788-798 MHz. The subject Request is one of three concurrent but separate requests.

The requested operation enables General Dynamics' continuing investment in LTE technology development and testing that will directly benefit the FirstNet program. As the recent FirstNet Draft RFP requires Band Class 14 laboratory tests by FirstNet launch, General Dynamics would be placed at a competitive disadvantage if the subject Request were not granted, because we would not be able to test in preparation.

General Dynamics therefore is submitting the subject Request and agrees to the following conditions, which are comparable to those of other public applications for similar use and purpose.

- General Dynamics will not utilize the license in conjunction with the provision of mission-critical communications.
- General Dynamics has designated a project manager and "kill switch" point of contact for Band Class 14 operations: Mr. Gary Hall. Mr. Hall can be reached at 407-823-7017.

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- General Dynamics understands that the experimental license will permit only shared use of the subject radio frequencies and it must coordinate with other entities licensed in Band Class 14.
- General Dynamics recognizes that a separate concurrence from FirstNet will be required for renewal of this license.
- General Dynamics acknowledges that FirstNet may terminate the license at any time and for any reason.
- General Dynamics acknowledges that if FirstNet, its assignees or lessees operate in the area in the FirstNet spectrum, that General Dynamics may have to reduce coverage or power levels of its operations or cease its operations entirely to prevent interference to the operations of FirstNet, its assignees, or lessees.
- General Dynamics affirms that all of its experimental operations will be secondary, not to cause interference to narrowband or broadband operations authorized on a primary basis, including in the spectrum licensed to FirstNet; and narrowband or broadband operators authorized on a primary basis, including in the spectrum licensed to FirstNet, have no obligation to mitigate any interference that such primary use may present to the General Dynamics experimental operations.
- General Dynamics has analyzed information from the FCC's license database and determined that there are not incumbent users in the specified geographic area and spectrum region.

General Dynamics is requesting a license to operate through December 31, 2016. As acknowledged above, we recognize that the period of operations is subject to modification or termination by FirstNet or the FCC at any time.

General Dynamics appreciates your attention to this matter. We trust that the licensing branch will be able to act expeditiously to grant us an experimental license per the conditions above and the subject Request.

Sincerely,



William W. Weiss

Vice President & General Manager