

GENERAL DYNAMICS
C4 Systems

William W. Weiss
Vice President & General Manager

April 29, 2015

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

Re: Request for Experimental License; File No. 0251-EX-PL-2015 (Cookstown/Fort Dix, NJ)

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 CERDEC Ground Activity, Range 1 Fort Dix, 395 Hockamick Road, Cookstown NJ 08511, 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.

This Request, one of three concurrent but separate requests, has been pre-coordinated with Mr. Patrick Sullivan of FirstNet's Office of Chief Counsel. In a letter dated April 2, 2015 from General Dynamics to Mr. Sullivan, General Dynamics described its role as an Original Equipment Manufacturer pursuing FirstNet business including manufacture, integration, and test of Band Class 14 equipment. We stated our commitment to the FirstNet program, and the benefits to FirstNet and the nation of our planned manufacture, integration and test program.

In a follow-up teleconference on April 8, 2015, General Dynamics and Mr. Sullivan discussed General Dynamics' applications, including the purpose, duration, and location of General Dynamics' proposed radio operations. Mr. Sullivan indicated to General Dynamics that we may proceed with our requests to the FCC to support our technical development program for Band Class 14 equipment, but must balance program operations with the primacy of FirstNet as the Band Class 14 spectrum licensee and the rights of others operating concurrently.

On April 27, 2015, FirstNet released a Draft Request for Proposal that includes Band 14 laboratory tests as within scope for the Initial Operational Capability-1 milestone (six months after award). This clearly signals FirstNet's intent that credible offerors must have this capability,

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April 29, 2015

Page 2

General Dynamics therefore is submitting this Request, and agrees to the following:

- 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. Paul Anderson. Mr. Anderson can be reached at 508-360-2381.
- 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. This period of operations is consistent with our discussions with Mr. Sullivan and is subject to modification or termination by FirstNet at any time as acknowledged above.

General Dynamics appreciates your attention to this matter. As we have pre-coordinated our request with FirstNet, and the FCC routinely coordinates requests with FirstNet, we trust that the licensing branch will be able to act expeditiously to grant us an experimental license per the terms of our referenced Request.

Sincerely,



William W. Weiss
Vice President & General Manager

Cc: Mr. Patrick Sullivan, FirstNet