

**General Dynamics C4 Systems
Request for Part 5 Experimental
Special Temporary Authority
ELS File No. 0848-EX-ST-2013**

NARRATIVE STATEMENT

Pursuant to Section 5.3(d) and (f) and Section 5.61 of the Commission's rules, 47 C.F.R. §§ 5.3(d), (f), 5.61 (2012), General Dynamics C4 Systems ("C4S"), hereby respectfully requests special temporary authority ("STA") from **October 18, 2013 through October 23, 2013**, to operate in the 758-768/788-798 MHz bands for the purpose of demonstrating prototype broadband Long-Term Evolution ("LTE") equipment to public safety agencies at the annual International Association Chiefs of Police ("IACP") Conference in Philadelphia, Pennsylvania.

General Dynamics C4S has requested a letter of consent from the First Responder Network Authority ("FirstNet") for the proposed operation, by way of the associated cover letter submitted with this application.

A. Purpose of Operation and Need for STA:

General Dynamics C4S is a leading manufacturer of end-to-end LTE infrastructure equipment and devices. The experimental authority requested herein will allow the company to demonstrate the functionality of equipment designed to support the needs of the public safety and homeland security community.

Specifically, General Dynamics C4S proposes to conduct demonstrations of Band 14 LTE equipment at the IACP annual conference in Philadelphia, PA. To accommodate set-up requirements as well as to ensure all operations up to demo tear-down are covered by Commission authorization, General Dynamics C4S respectfully requests that the FCC grant the STA for the period October 18, 2013 through October 23, 2013.

Grant of an STA will allow General Dynamics C4S to demonstrate equipment and obtain additional feedback so that it may enhance the company's efforts to design, develop and improve its equipment to meet the communications needs of potential public safety users.

B. Location of Proposed Operation:

General Dynamics C4S proposes to conduct its demonstrations in the vicinity of the Pennsylvania Convention Center in Philadelphia. Equipment would include a

temporary base station and associated antenna, along-with a small number of portable/mobile units, all operating in the vicinity of the General Dynamics booth at the conference. The address and approximate reference coordinates for location of the temporary fixed base station deployment are:

Pennsylvania Convention Center
1101 Arch Street Philadelphia,
PA 19107

39° 57' 14" North Latitude
75° 09' 32" West Longitude
Datum: NAD83

C. Technical Specifications:

1. Frequencies Desired

General Dynamics C4S requests authorization to operate in the bands 758-768/788-798 MHz allocated for a nationwide public safety broadband network yet to be built and licensed to FirstNet on a nationwide basis. A copy of this application and request for FirstNet consent is being submitted concurrently with NTIA, which manages the FirstNet consent process.

2. Effective Radiated Power

All power levels will comply with the limits set forth in the FCC's rules, including those relating to human exposure to radiation.

Up to 6 portable/mobile units will be deployed and configured to operate at a maximum average power level of 200 mW effective radiated power ("ERP"). One base station will be located at the convention center and will be configured to operate at a maximum average output power level of 10 Watts ERP. General Dynamics C4S will reduce the actual powers to the minimum power needed for successful operation, based on set-up and testing at the demonstration site.

3. Modulation and Emissions

General Dynamics C4S proposes to operate using OFDM modulation. The primary emission designators are 5M0W7W & 10M0W7W. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequency bands requested.

4. Antenna Information

The antenna for the temporary fixed base station will be located at the Pennsylvania Convention Center in Philadelphia at a height no greater than 10 feet above the floor. The portable/mobile unit antennas in and around the demonstration site will be located as required for a successful demonstration. No antennas will be mounted in a fashion that will require approval under FAA and FCC rules and regulations.

5. Equipment To Be Used

General Dynamics C4S expects to conduct its demonstration with one base unit and up to six mobile/portable units. Moreover, General Dynamics C4S will limit the power, area of operation, and transmitting times to the minimum necessary to provide an effective demonstration.

D. Protection Against Causing Interference:

As noted above, General Dynamics C4S has requested authority to operate in the 758-768/788-798 MHz bands allocated for a nationwide public safety broadband network and licensed to FirstNet on a nationwide basis. A copy of this application and request for FirstNet consent to this request for STA is being submitted concurrently with NTIA, which manages the FirstNet consent process. Under Commission rules, Low Power TV stations and auxiliary stations were previously required to vacate the 700 MHz band, so no interference should occur to broadcast facilities. General Dynamics C4S also conducted a search of the Commission's Universal Licensing System ("ULS") database and determined that the proposed demonstration at the APCO conference should not interfere with any primary operations in that spectrum. Furthermore, as noted above, the length of the demonstration period is short, extending only from October 18, 2013 through October 23, 2013.

E. Restrictions on Operation:

General Dynamics C4S is not seeking authority to perform a market study under this STA. Moreover, no fees will be charged to entities using the equipment during this test. After the test is completed, General Dynamics C4S will disassemble the demonstration facilities. General Dynamics C4S also recognizes that the operation of any equipment under experimental authority must not cause harmful interference to authorized facilities. In the unlikely event interference occurs, General Dynamics C4S will take immediate steps to resolve the interference, including discontinuance of operation if necessary.

Entities will be advised in accordance with Section 2.803 of the Commission's rules, 47 C.F.R. §2.803 (2012), that any unapproved devices which have not been authorized as required by the FCC are not being offered for sale or lease, or sold or leased, until authorization is obtained.

F. Public Interest:

General Dynamics C4S submits that issuance of an STA as requested is in the public interest, convenience, and necessity. Grant of an STA will help General Dynamics C4S to develop innovative equipment that will accommodate the communications needs of the public safety community.

G. Contact Information:

For questions about this application, please contact:

Nathaniel Berwind
Senior Contracts Manager
General Dynamics C4 Systems
8201 E. McDowell Rd., MD H2009
Scottsdale, AZ 85257
Ph: (509) 590-8052
nathaniel.berwind@gdc4s.com

In the unlikely event interference concerns should arise during the period of authorization for this STA, please contact:

Keith Sinclair
General Dynamics C4 Systems
Ph: (415) 310-9165
keith.sinclair@gdc4s.com