

GENERAL DYNAMICS
C4 Systems

September 20, 2013

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. 0892-EX-ST-2013

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 to demonstrate Long Term Evolution (“LTE”) equipment and devices in Philadelphia, Pennsylvania in conjunction with the International Association of Chiefs of Police (“IACP”) Conference, which will take place October 19 to October 23, 2013. We specifically seek authority to use the 700 MHz Band 14 spectrum, 758-768/788-798 MHz.

The demonstration will conform to the following parameters:

1. Operation will be confined to the showroom floor of the Pennsylvania Convention Center at 1101 Arch Street Philadelphia, PA 19107 and will be conducted only during exposition business hours. The equipment for this operation will include one General Dynamics base station and associated antenna located at the demonstration site, along with a small number of portable user units. Power levels of the equipment will be reduced sufficiently to limit coverage to the General Dynamics booth area.
2. General Dynamics requests authority to operate over the 758-768/788-798 MHz band, which is currently licensed on a nationwide basis to the First Responder Network Authority (“FirstNet”).
3. Operation will occur between October 18, 2013 and October 23, 2013, allowing time for setup and testing, demonstration, and teardown.
4. The Experimental STA cannot be renewed. To the extent General Dynamics would like to obtain additional Experimental STA use of the radio frequencies licensed to FirstNet, beyond the period specified above, General Dynamics must file a separate request with the FCC.

5. General Dynamics has analyzed information from the FCC's ULS databases and has determined that the proposed operation would not interfere or create a significant potential for interference with any public safety operation in the 700MHz band. Specifically, we found no active public safety licenses authorizing operation in the Philadelphia, PA area on frequencies that are co-channel to those proposed in this STA request.
6. General Dynamics understands that multiple IACP Conference vendors will be operating in the same frequency spectrum within the Convention Center during the exposition. It will actively work with the other vendors to assure that interference to/from the other vendors is minimized.
7. Temporary operations pursuant to this Experimental STA will not be used in mission-critical operations or in the delivery of live transmissions in duties to protect life, property, or safety.
8. The Experimental STA will serve the public interest by providing IACP Conference attendees with an opportunity to test and receive an introductory knowledge of the potential benefits and capabilities of a Band 14 LTE public safety network.

For the foregoing reasons, General Dynamics requests that the Commission grant the requested Experimental STA for the purpose of demonstrating LTE equipment at the IACP Conference.

Respectfully submitted,



James Norton
Vice President, Washington Operations
General Dynamics C4 Systems

CC: Genaro Fullano, FCC
Regina Harrison, NTIA