# Giancarlo, Angela

From: Giancarlo, Angela

Sent: Tuesday, December 04, 2018 2:30 PM

**To:** Douglas Young

Subject: RE: Request for Info - File # 1985-EX-ST-2018 - REPLY TO D. Young on 12/3/18

Doug—Thank you for your reply. I have included responses to your most recent questions in **blue bold**, below. I will scan this email exchange and upload it into the application momentarily. Thank you.—Angela

# Angela E. Giancarlo

**Partner** 

# Mayer Brown LLP

1999 K Street, Northwest Washington, DC 20006 +1 202 263-3305 - office +1 703-283-5442 - mobile agiancarlo@mayerbrown.com www.mayerbrown.com

From: Douglas Young <Douglas.Young@fcc.gov> Sent: Tuesday, December 04, 2018 8:42 AM

To: Giancarlo, Angela < A Giancarlo@mayerbrown.com>

Subject: RE: Request for Info - File # 1985-EX-ST-2018 - REPLY TO D. Young on 12/3/18

#### \*\*EXTERNAL SENDER\*\*

Angela,

Make sure you submit your response to the system. Per your request, I am submitting this reply to the System as an attachment.

Submit a statement saying that nothing in the form is confidential and I will change the application. This is to confirm that nothing in the form is confidential. Please modify the application to indicate as such. Thank you.

You have the choice of asking me to remove the confidential exhibit or submitting the justification for confidentiality as described below. **Please remove the exhibit. Thank you.** 

Amend the application to use the lowest power you feel comfortable with and I will send the application out for coordination with the relevant parties. Per below, I have amended the application to indicate that GET would require a power level between 1 and 1.5 KW.

Regards,

Doug Young Electronics Engineer Federal Communications Commission Experimental Licensing Branch

Phone: (202) 418-2440 Fax: (202) 418-1918

Email: Douglas. Young@fcc.gov

From: Giancarlo, Angela < A Giancarlo @mayerbrown.com >

**Sent:** Monday, December 3, 2018 1:30 PM **To:** Douglas Young <Douglas.Young@fcc.gov>

Subject: RE: Request for Info - File # 1985-EX-ST-2018 - REPLY TO D. Young on 12/3/18

Hi Doug and thank you for your preliminary input our application for STA. Pursuant to my voice mail messages, I would like to review your questions and our proposed responses in **blue bold** below. We are anxious to stay on track given our narrow deadline. Thanks.—Angela

# Angela E. Giancarlo

Partner

# Mayer Brown LLP

1999 K Street, Northwest Washington, DC 20006 +1 202 263-3305 - office +1 703-283-5442 - mobile agiancarlo@mayerbrown.com www.mayerbrown.com

From: oetech@fccsun27w.fcc.gov <oetech@fccsun27w.fcc.gov>

Sent: Friday, November 30, 2018 3:18 PM

**To:** Giancarlo, Angela < AGiancarlo@mayerbrown.com > **Subject:** Request for Info - File # 1985-EX-ST-2018

\*\*EXTERNAL SENDER\*\*

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TO: Angela Giancarlo, Global Energy Corporation

agiancarlo@mayerbrown.com

FROM: Doug Young

Douglas. Young@fcc.gov

**Global Energy Corporation** Applicant:

1985-EX-ST-2018 File Number:

Correspondence Reference Number: 45275

11/30/2018

Date of Original Email:

- 1. You have marked the form itself confidential. As a matter of policy, we will not withhold from public any information necessary for interference mitigation. This includes applicant name, contact info, location, frequency and power, all of which are contained within the form. If there is nothing in the form itself that cannot be released to the public, state this. This confirms that there is nothing in the form that cannot be made public Would you require that I amend the form to uncheck the "Confidential" box? Please let me know. If there is anything in the ""Why STA is necessary"" or ""Purpose of Operation"" text boxes that is confidential, you will have to request withdrawal of the application and refile, since this information must be available to the public and cannot be removed from the initial version of the application. This confirms that there is nothing in the form that cannot be made public.
- 2. You have marked an exhibit as confidential. You must submit an item-by-item justification for the confidentiality request to answer the nine subsections of Part 0.459(b) of the FCC's rules. All non-confidential material must be separated from the confidential material and must be viewable by the public, as must the confidentiality justification. I attached our KDB Inquiry (and letter affirming confidential treatment) as an exhibit to the application thinking that this background would benefit OET's analysis. The KDB Inquiry is not integral to the application, however. Therefore, I would propose to remove the exhibit from the application. Do let me know please.
- 3. Output power of 2 kW seems excessive for an indoor test. Submit a justification for this large output power or amend your application to reduce it. With FCC approval, the System will be constructed for high power, outdoor operations (i.e., power above 2kW). At this time, however, GET intends to demonstrate (at the Consumer Electronics Show in early January) a prototype operating indoors to wirelessly charge a commercial grade UAV. When we spoke last week, I understood you to suggest that GET request an output power that "would allow for some leeway." Thus, we requested 2 kW. In response to

this inquiry, GET respectfully requests permission to operate between 1—1.5 kW indoors (with 1 kW being the lowest and 1.5 kW being the highest).

At bottom, GET must be able to demonstrate that the System is capable of transmitting enough power to wirelessly charge an airborne (indoors) commercial grade UAV. GET has no plans to fly a heavy, commercial UAV indoors, nor would doing so be productive. Interested parties need only to observe and validate an operational, yet "toned down," system to understand and appreciate the promise of a future, larger and more powerful commercial system. At CES, the system would be mounted on a real drone, fully isolated and capable of dissipating low power, which would enable GET to demonstrate the current flowing wirelessly into the System in real-time (via onboard measurement equipment).

Please let me know if this revision merits approval.

4. Would a commission grant of this application come within Section 1.1307 of the FCC Rules, such that it may have a significant environmental impact? If "YES", include as an exhibit an Environmental Assessment as required by Section 1.1311. No.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of 11/30/2018 may result in application dismissal pursuant to Section 5.67 and forfeiture of the filing fee pursuant to Section 1.1108.

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