



Forrest Pierson 7821 Orion Avenue Van Nuys, CA USA 91406 phone 1.818.901.2457 fax 1.818.901.2536 forrest.pierson@harris.com

October 23rd, 2015

Federal Communications Commission Office of Engineering and Technology 445 12th Street SW Washington DC 20554

Justification of a five year license:

Dear Mr. Young,

As a company originally under the Gilfillan and ITT Gilfillan name, we have been manufacturing pretty much the same PAR (Precision Approach Radar) systems for many years. Yes, technical upgrades, obsolescence and improved efficiency have altered the basic systems but aspects like range, power, emissions, antenna heights and frequencies used have remained constant on all PAR systems.

The FAT (factory acceptance testing) we perform are done regularly for each of our customers and are not necessarily considered experimental in nature. Therefore, we are requesting the ability to acquire a standard license for these systems as opposed to a temporary status.

Please let me know if you have any further questions I can answer.

Sincerely,

Forrest Pierson

Frequency Manager

818.901.2457

Forrest.Pierson@harris.com