

From: Paul Sinderbrand

To: Behnam Ghaffari

Date: September 04, 2012

Subject: FCC File No. 0682-EX-ST-2012

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Message:

The STA requests submitted on behalf of the Mobile and Communications Group of Intel Corporation do not propose a single experimental program. Rather, each filing seeks to authorize an individualized evaluation of a distinct new wireless product that Intel intends to introduce. Each of the STA requests seeks permission to test a fundamentally different product in residential areas. The devices utilize a range of RF frequencies. The device in File No. 0682-EX-ST-2012, for example, only uses WiFi (2.4 GHz and 5 GHz) and Bluetooth. Other devices not only use those bands, but also include various combinations and permutations of 13.65 MHz for NFC, cellular, PCS and/or AWS spectrum. Different devices include different feature sets, and employ different operating systems. Testing of one broad type of device is proposed for two markets where testing is not proposed for the other broad type of device. While some testers may have multiple products, others will not. Based on the complexity of the testing and the development stage for the device, different numbers of units are proposed to be operated in residential areas. While Intel is prepared to combine the requests into a single one upon Commission request, doing so will increase the complexity of the filing because of the numerous combinations and permutations of locations, frequencies, technical parameters and units involved, and will undoubtedly cause confusion if Intel is required in the future to seek modification of a single large STA rather than submit new device-specific STAs as Intel develops and seeks to test new wireless devices.