

From: David West

To: Behnam Ghaffari

Date: September 23, 2021

Subject: FCC File No. 0565-EX-CN-2021

Message:

Mr. Ghaffari:

As addressed in the email below which was sent today, Leidos is finalizing NRQZ coordination with NRQZ Administrator Paulette Woody, and subject to the confirmations requested in the email below Leidos believes that this NRQZ coordination should be considered finalized.

Leidos requests additional time - until October 15, 2021 - to obtain confirmation of completion of NRQZ coordination.

Best regards,

Jeff Rummel
Attorney for Leidos, Inc.

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From: Rummel, Jeffrey
Sent: Thursday, September 23, 2021 10:20 AM
To: Behnam Ghaffari ; Zauderer, Bevin A. ; Paulette Woody
Cc: West, David M.
Subject: For Mr. Ghaffari (FCC), Dr. Zauderer (NSF) and Ms. Woody (NRQZ) - Leidos - NRQZ Coordination - Pending Experimental Application under File No. 0565-EX-CN-2021 (Ref. 64276)
Importance: High

Mr. Ghaffari, Dr. Zauderer and Ms. Woody:

As you can see below, Leidos is finalizing NRQZ coordination with NRQZ Administrator Paulette Woody.

Based on the information below, Leidos believes that this NRQZ coordination should be considered finalized:

Mr. Ghaffari – if you could please provide the requested confirmations below directed for you, that would be greatly appreciated.

Dr. Zauderer – if you could please provide the requested confirmations below directed for you, that would be greatly appreciated.

Ms. Woody – if you could please provide the requested confirmations below directed for you, that would be greatly appreciated.

Confirmation Requested From Mr. Ghaffari

1. NRQZ Comment from Email below:

“It should be noted that the NRQZ office has not received a copy of the actual ULS filing and thus has no way to confirm these values.”

Leidos Reply:

- The PDF scan attached, previously provided to Ms. Woody, reflects the actual pending application at the FCC.

- If Mr. Ghaffari could please confirm for Ms. Woody that the attached scan reflects the current pending application, such confirmation should resolve this item.

NOTE: The application is for experimental authority and therefore the application is located in the ELS (Experimental Licensing System) database, not the ULS (Universal Licensing System)

2. NRQZ Comment from Email below:

“By copy of this email, the NRQZ office requests that the FCC confirm that this information matches the current application on file. If it does, then the NRAO, Green Bank, WV, and Sugar Grove Research Station, Sugar Grove, WV, would have no objection to this frequency assignment.”

Leidos Reply:

- The PDF scan attached, previously provided to Ms. Woody, reflects the actual pending application at the FCC.

- The chart below is consistent with the data in the pending application

- If Mr. Ghaffari could please confirm for Ms. Woody that the attached scan and the chart below reflects the current pending application, such confirmation should resolve this item.

3. NRQZ Comment from Email below:

“It should be noted that there is possibly NG (non-governmental) frequency assignments pending at the NTIA pending NSF confirmation of NRQZ coordination. Copies of those assignments should be provided to the NRQZ office so that the data can be verified between the ULS filing and the NG assignment(s).”

Leidos Reply:

- On Tuesday, Mr. Ghaffari provided the following NG numbers associated with this application:

0565-EX-CN-2021

NG251117

NG251118

NG251119

NG251120

NG251121

NG251122

NG251123

- If Mr. Ghaffari could please confirm these are the NG numbers for this application, such

confirmation should resolve this item.

Confirmation Requested From Dr. Zauderer

1. NRQZ Comment from Email below:

“By copy of this email, the NRQZ office requests that the NSF FAS representative confirm that the information in the GMF matches the FCC ULS filing. If it does, then the NRAO, Green Bank, WV, and Sugar Grove Research Station, Sugar Grove, WV, would have no objection to this frequency assignment and would recommend NSF vote approve for this temporary-fixed station.”

Leidos Reply:

- Again – the reference to “ULS” should be “ELS” as the application is for experimental authority in the ELS (Experimental Licensing System)
- If Dr. Zauderer could please confirm for Ms. Woody that the information in the GMF matches the attached PDF of the filing, such confirmation should resolve this item.

Confirmation Requested From Ms. Woody

1. NRQZ Comment from Email below:

“...if the values and station class (temporary-fixed) indicated above actually reflect the current filing at the FCC, then NRQZ coordination under 47CFR1.924(a) would not be required. However, the nature of this assignment is more consistent of a fixed station grant as it will be in operation for a 24 month period after the FCC review and approval process.”

Leidos Reply:

- The operations requested under this application are indeed for “temporary-fixed” operation, as the transmitters will be stationary when in operation, but could be moved within the specified .2km radius.
- Please note that the “temporary-fixed” designation relates to how the transmitters are to be operated – they do not relate to the time period of the overall operations. It is true that the time period of operations has been requested for an initial term of 2 years. Leidos does not believe that the requested 2 year term should prevent a “no objection” from NRQZ – as NRQZ has provided “no objections” to several 2 year experimental operations of Leidos.
- If Ms. Woody could please confirm that this explanation is sufficient to support a finding that NRQZ coordination is not required, then such confirmation should resolve this item.

Best regards,

Jeff Rummel
Attorney for Leidos, Inc.