

**MRTC Motorsport Communications
MRTC, Ltd.
STA Application 0214-EX-ST-2020
Frequency Coordination Exhibit and Narrative
Sebring, Florida FIA World Endurance Championship (WEC) Automobile Race
and the International Motor Sports Association (IMSA) WeatherTech SportsCar
Championship
March 18, 2020 through March 21, 2020**

This application proposes the use of amateur radio, land mobile, broadcast auxiliary and certain microwave bands in the immediate area of Sebring Motor Speedway for terrestrial only, international and domestic video production operation; for voice communications and telemetry for racing cars and communications with pit crews of the race teams; for weather radars in support of the automobile racing; and for two-way operational and security communications during the both the FIA World Endurance Championship (WEC) Automobile Race and the International Motor Sports Association (IMSA) WeatherTech SportsCar Championship (WTSSC) automobile race events and for testing prior to the event within and immediately surrounding the Sebring Motor Raceway. These are two of the largest automobile racing events in the United States. This application contains the universe of channels needed for operations for 29 race teams and all of the international and domestic video production covering these race events. All radio frequency operation is being coordinated by MRTC, Ltd. of the United Kingdom on site.

An engineering analysis has shown that there should be no interference to any licensed user of any of the subject bands, and with the addition of some broadcast auxiliary channels for use for international video and broadcast production purposes, the frequency list is otherwise similar to that which was granted by the Commission each of the last four years for this same event when it was located at the Circuit of the Americas Race Track in Austin, Texas (See WH9XUY, File No. 0618-EX-ST-2014; WI9XXY, File No. 0864-EX-ST-2015; and WK9XIQ, File No. 1241-EX-ST-2016) in Brooklyn, NY (See File No. 0634-EX-ST-2017), and last year, at Sebring, the current location (See, WO9XBF 0214-EX-ST-2019).

Per the conditions associated with the STA operation at Sebring last year, MRTC will at this year's racing events at Sebring during the period:

1. Notch out the following spot frequencies:
(+/- 12.5 kHz) 156.300 MHz, 156.525 MHz, 156.650 MHz, 156.800 MHz, 161.975 MHz, 162.025 MHz, 162.1625 MHz, 162.500 MHz, 163.3375 MHz, 164.0875 MHz, 164.250 MHz, 164.3625 MHz, 166.3625 MHz, 166.375 MHz, 166.5625 MHz, 166.6625 MHz, 167.125 MHz, 167.625 MHz, 168.025 MHz, 168.300 MHz, 168.425 MHz, 168.6125 MHz, 168.7375 MHz, 168.750 MHz, 169.650 MHz, 169.7875 MHz, 169.8125 MHz, 169.900 MHz, 170.075 MHz, 171.475 MHz, 171.5625 MHz, 172.275 MHz, 172.325 MHz, 172.350 MHz, 172.425 MHz, 172.450 MHz, 172.475 MHz, 172.5125 MHz, 173.675 MHz.

2. Notch out the 169.2125 – 169.4 MHz and the 172.8125 – 172.4 MHz bands in order to protect Air Traffic operations.

3. Coordinate with the local Society of Broadcast Engineers frequency coordinator prior to operation in 150-174 MHz, 440-470 MHz, 653-657 MHz and 6875-7125 MHz bands.

4. Obtain consent from the following within 50 miles of the contours of the testing area:

- > Paging Service licensees in 152 MHz
- > Paging Service licensees in 158 MHz
- > Paging Service licensees in 152 MHz/158 MHz
- > Paging Service licensees in 454 MHz/459 MHz
- > General Aviation Air-Ground Service in 454 MHz/459 MHz

5. Prior to commencing any operations in Aeronautical and Fixed frequencies (2360-2395 MHz), coordinate with the Aerospace and Flight Test Radio Coordinating Council (AFTRCC).

Should any FCC-licensed or United States government station report interference during the proposed operations, operation on that channel or band will immediately cease and not resume unless and until the interference complaint is resolved. However, during the past four years' prior events using most of these same frequencies no interference has been reported whatsoever. There are on-site coordinators for this event who are charged with interference avoidance and mitigation.

The stop-buzzer contact for this event is Mr. Chris Lee of MRTC Motorsports, who can be reached at +44 (0)7920 130 453. Alternatively, counsel for the applicant can be reached by mobile phone at any time at 301-351-3795 and will act as an additional stop-buzzer contact for this event as well.

With respect to the proposed use of land mobile and Amateur Radio frequencies for video production, voice and telemetry, the use of amateur allocations in this STA application have been coordinated with the American Radio Relay League, Incorporated. Land mobile channels to be utilized during the race event within the requested band limits have been investigated using the Commission's ULS database and monitored on-site and found to be unoccupied. The Society of Broadcast Engineers local frequency coordinator for central Florida will be contacted to coordinate the use of broadcast and broadcast auxiliary channels. Technical coordination staff will be on site during the race and channel monitoring and on-site frequency coordination will ensure against any interference.

All communications can also be directed to the office of counsel for MRTC Motorsports Communications:

Christopher D. Imlay
Booth, Freret & Imlay, LLC

14356 Cape May Road
Silver Spring, MD 20904-6011
1-301-384-5525 office telephone
1-301-351-3795 cell
chris@imlaylaw.com
chris.imlay@gmail.com