NARRATIVE STATEMENT

Pursuant to Sections 5.51 and 5.53 of the Commission's rules, 47 C.F.R. §§ 5.51, 5.53 (2011), Motorola Solutions, Inc., hereby respectfully requests an experimental license, for a period of two years, to operate in the 758-768/788-798 MHz band for the purpose of conducting tests in connection with the development of Long Term Evolution (LTE) broadband equipment for the 700 MHz band. The testing will be conducted from up to three sites at and near the offices of Motorola Solutions in Schaumburg, Illinois and at Plantation, Florida.

A letter of concurrence has been requested from the Illinois State Police, which is authorized to operate certain narrowband vehicular repeaters under Part 90 of the FCC's rules in the broadband public safety spectrum, pending further Commission action on the relocation of its operations to conform to the FCC's revised 700 MHz bandplan.

The following provides more details for this request.

A. <u>Purpose of Operation and Need for Experimental License</u>:

Motorola Solutions is a leading manufacturer of mobile radio equipment for the public safety and homeland security community and is continually engaged in the design and development of new and innovative communications equipment. The experimental authority requested herein will allow the company to test and demonstrate the performance and functionality of prototype devices designed to support the needs of the public safety and homeland security community.

Specifically, Motorola Solutions proposes to conduct testing of prototype equipment at up to three sites in and around its offices located at 1303 East Algonquin Road in Schaumburg, Illinois and at 8000 West Sunrise Boulevard in Plantation, Florida. Grant of an experimental license will allow Motorola Solutions to test and demonstrate prototype equipment to enhance the company's efforts to design and develop its equipment to meet the communications needs of potential users.

B. Location of Proposed Operation:

Motorola Solutions proposes to conduct the proposed tests using three fixed base station transmitters and antennas located in and around its offices in Schaumburg, Illinois. The addresses and approximate coordinates (in Datum: NAD83) of the three sites are:

- 1. 1303 East Algonquin Road Schaumburg, Illinois 60196 42° 02' 39" North Latitude 88° 02' 36" West Longitude
- 2. 800 East Northwest Highway Palatine, Illinois 60038 42° 06' 11" North Latitude 88° 01' 24" West Longitude
- 8000 West Sunrise Boulevard Plantation, Florida 26° 08' 52" North Latitude 80° 15' 14" West Longitude

C. <u>Technical Specifications</u>:

1. Frequencies Desired

Motorola Solutions requests authorization to operate in the band 758-768/788-798 MHz. This band encompasses both the 758-763/788-793 MHz band known as the upper 700 MHz D block, which has not yet been licensed for regular operation, and the 763-768/793-798 MHz public safety block.

2. Effective Radiated Power

All power levels will comply with the limits set forth in the FCC's rules, including those relating to human exposure to radiation. The mobile/portable units to be deployed are configured to operate at a peak power level of 2.5 Watts effective radiated power (ERP). The base station will be configured to operate at a peak power level of 500 Watts ERP. Motorola Solutions will vary the actual powers within the maximums noted above to test coverage results.

In addition, Motorola Solutions will evaluate environmental considerations to ensure compliance with Section 1.1306 of the FCC's rules, 47 C.F.R. § 1.1306 (2011), and, in particular, the human exposure requirements set forth in FCC OET Bulletin No. 65.

3. Modulation and Emissions

Motorola Solutions proposes to operate using OFDM modulation. The primary emission designators are 5M0G7D, 5M0W7W, 5M0G2D, 5M0D7D, 10M0G7D, 10M0W7W, 10M0G2D, and 10M0D7D. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequency bands requested.

4. Antenna Information

The fixed base station transmitter antenna will be located outdoors at the three sites specified above. The antenna elevation above ground level will not exceed 100 feet. The mobile/portable antennas will be installed at a height not greater than 6 meters above ground when used outdoors or at various locations as needed for testing when used indoors. No antennas will be mounted in a fashion that will require approval under FAA and FCC rules and regulations.

5. Equipment To Be Used

Motorola Solutions expects that it will be able to conduct its demonstration with not more than three base stations and up to twenty mobile/portable units at each site. Moreover, Motorola Solutions will limit the power, area of operation, and transmitting times to the minimum necessary to evaluate the equipment.

D. <u>Protection Against Causing Interference</u>:

As noted above, Motorola Solutions has requested authority to operate in the 758-768/788-798 MHz band. This band encompasses both the 758-763/788-793 MHz band known as the upper 700 MHz D block, which has not yet been licensed for regular operation, and the 763-768/793-798 MHz public safety block.

Motorola Solutions has analyzed information from the FCC's license databases and has determined that the proposed operation would not interfere with, or create a significant potential for interference with, any public safety operations in the 700 MHz band. The State of Illinois STARCOM21 system utilizes a portion of the PSST spectrum block for operation of vehicular repeaters, pursuant to a waiver that allows it to continue to operate under the former 700 MHz bandplan. Based on discussions with the State, however, the operations proposed under this application are not expected to cause interference to the State's system because vehicular repeaters are seldom needed for coverage in the areas where testing will be conducted. No reports of interference have been received as a result of Motorola Solutions' testing in the past with parameters identical to those being requested in this application. Motorola Solutions is coordinating with the Illinois State Police STARCOM21 System Administrator to obtain a letter of concurrence on extending the testing and will provide that concurrence as soon as it is received.

Motorola Solutions also searched the Commission TV database and determined that the proposed operation would not interfere with any authorized Low Power TV stations in the area.

E. <u>Restrictions on Operation</u>:

Motorola Solutions is not seeking authority to perform a market study under this experimental license. Moreover, no fees will be charged to entities using the equipment during this test. After the test is completed, Motorola Solutions will recall and recover all devices that do not comply with FCC regulations.

Motorola Solutions also recognizes that the operation of any equipment under experimental authority must not cause harmful interference to authorized facilities. Should interference occur, Motorola Solutions will take immediate steps to resolve the interference, including if necessary arranging for the discontinuance of operation.

In addition, Motorola Solutions will advise entities testing the equipment that permission to operate has been granted under experimental authority issued to Motorola Solutions, that such operation is strictly temporary, and that the equipment may not cause harmful interference. Entities will also be advised in accordance with Section 2.803 of the Commission's rules, 47 C.F.R. §2.803 (2011), that any unapproved devices have not been authorized as required by the rules of the FCC and are not being offered for sale or lease, or sold or leased, until authorization is obtained.

F. <u>Public Interest Statement</u>:

Motorola Solutions submits that issuance of an experimental license as requested is in the public interest, convenience, and necessity. Grant of an experimental license will permit Motorola Solutions to develop innovative equipment that will accommodate the communications needs of the public safety and homeland security community.

G. <u>Contact Information</u>:

For questions about this application, please contact:

Kurt DeSoto, Counsel to Motorola Solutions, Inc. Wiley Rein LLP 1776 K Street, N.W. Washington, DC 20006 Voice: (202) 719-7235 Facsimile: (202) 719-7207 kdesoto@wileyrein.com

In the unlikely event interference concerns should arise during the period of authorization for this license, please contact:

Stu Overby Senior Director, Spectrum Strategy Motorola Solutions, Inc. 1303 E. Algonquin Rd. Schaumburg, IL 60196 Telephone: (847-421-2952 <u>Stu.overby@motorolasolutions.com</u>

The contact information for the designated project manager and "stopbuzzer" contact for the operations to be conducted as proposed under the experimental license is:

> Mark Solak Motorola Solutions, Inc. 1303 E. Algonquin Rd. Schaumburg, IL 60196

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