Motorola Solutions, Inc.
Request for Part 5 Experimental
Special Temporary Authority
ELS File No. 1316-EX-ST-2016

NARRATIVE STATEMENT

Pursuant to Section 5.3(d) and (f) and Section 5.61 of the Commission's rules, 47 C.F.R. §§ 5.3(d), (f), 5.61 (2015), Motorola Solutions, Inc., hereby respectfully requests special temporary authority ("STA") from **October 14 through October 19, 2016**, to operate in the 758-768/788-798 MHz bands for the purpose of demonstrating prototype broadband Long-Term Evolution ("LTE") equipment to public safety agencies during the annual International Association Chiefs of Police ("IACP") Conference to be held in San Diego, California.

A. Purpose of Operation and Need for STA:

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 demonstrate the functionality of prototype devices designed to support the needs of the public safety and homeland security community.

Specifically, Motorola Solutions proposes to conduct demonstrations of prototype equipment during the IACP annual conference in in San Diego, CA. To accommodate set-up requirements as well as to ensure all operations up to demo tear-down are covered by Commission authorization, Motorola Solutions respectfully requests that the FCC grant the STA for the period October 14 through October 19, 2016.

Grant of an STA will allow Motorola Solutions to demonstrate prototype equipment and obtain additional feedback so that it may enhance the company's efforts to design, develop and improve its equipment to meet the communications needs of potential users.

B. <u>Location of Proposed Operation</u>:

Motorola Solutions proposes to conduct its demonstrations at the San Diego Convention Center. Equipment would include a temporary base station and associated antenna, along-with a limited number of portable/mobile units, all operating in the vicinity of the base station. The address and approximate reference coordinates (in Datum: NAD83) of the temporary fixed base station is:

San Diego Convention Center 111 W. Harbor Drive San Diego, CA 92101

32º 42' 22" North Latitude 117º 09' 42" West Longitude

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

1. Frequencies Desired

Motorola Solutions requests authorization to operate in the bands 758-768/788-798 MHz allocated for a nationwide public safety broadband network yet to be built and licensed to the First Responder Network Authority ("FirstNet").

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.

Up to 10 portable/mobile units will be deployed and configured to operate at a maximum average power level of 250 mW effective radiated power ("ERP") and a maximum peak power level of 2.5 Watts ERP. The base station will be located at the convention center and will be configured to operate at a maximum average power level of 5 Watts ERP and a maximum peak power level of 50 Watts ERP. Motorola Solutions will reduce the actual powers to the minimum power needed for successful operation, based on set-up and testing at the demonstration site.

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 antenna for the temporary fixed base station will be located at the San Diego Convention Center at a height no greater than 20 feet above the floor. The portable/mobile unit antennas in and around the demonstration site will be located as required for a successful demonstration. 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 to conduct its demonstration with one base unit and up to ten mobile/portable units. The base station is a prototype unit from Ericsson and the mobile/portable units are prototype equipment from Motorola Solutions. Moreover, Motorola Solutions will limit the power, area of operation, and transmitting times to the minimum necessary to provide an effective demonstration.

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

As noted above, Motorola Solutions has requested authority to operate in the 758-768/788-798 MHz bands allocated for a nationwide public safety broadband network and licensed to FirstNet. Motorola Solutions understands that it must accept interference from any other users of these bands and that all operations by Motorola Solutions will be on a secondary basis and must not cause interference to FirstNet operations or to those approved to operate in the 758-768/788-798 MHz bands (e.g., SMLA licensees/current incumbents).

Motorola Solutions has verified with reasonable supporting detail that no current potential exists for interference to FirstNet operations or to those approved to operate in the 758-768/788-798 MHz bands. It conducted a search of the Commission's Universal Licensing System ("ULS") database and verified that the proposed demonstration in San Diego should not interfere with any primary operations in that spectrum. Moreover, under Commission rules, Low Power TV stations and auxiliary stations were previously required to vacate the 700 MHz band, so no interference should occur to broadcast facilities. Furthermore, as noted above, the length of the tests and demonstrations will be limited, extending extending only from October 14 through October 19, 2016.

In addition, Motorola Solutions recognizes that multiple STAs might have been requested and granted for operation in the same area, that these entities must effectively coordinate their operations, and that failure to do so may result in immediate suspension of STA.

Moreover, Motorola Solutions has established a point of contact ("POC") identified below with "kill switch" authority and certifies that the Governor-appointed FirstNet Single Point of Contact within the proposed STA location (as identified at www.firstnet.gov/consultation has been notified of the STA application. Motorola agrees to cease operations at the request of FirstNet immediately upon receipt of request to kill switch POC until such time, as determined by FirstNet, that the operations may continue.

In summary, the analysis conducted by Motorola Solutions indicates the proposed operation should not cause interference with any licensed operation. Should interference occur, Motorola Solutions will take immediate steps to resolve the interference, including if necessary arranging for the discontinuance of operation.

E. Restrictions on Operation:

Motorola Solutions is not seeking authority to perform a market study under the requested STA. Moreover, the demonstration will not involve live-duty operations by first responders or others to protect life, property, or safety. In addition, no fees will be charged to entities using the equipment during this test. After the test is completed, Motorola Solutions will disassemble the demonstration facilities.

Entities will be advised in accordance with Section 2.803 of the Commission's rules, 47 C.F.R. §2.803 (2015), that any unapproved devices which have not been authorized as required by the FCC are not being offered for sale or lease, or sold or leased, until authorization is obtained.

F. Public Interest:

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

G. Contact Information:

Technical Contact and "Stop Buzzer/Kill Switch:"

Geoff Grode Lead Technician Motorola Solutions, Inc. Telephone: (224) 325-9729

Geoffrey.Grode@motorolasolutions.com

Motorola Solutions FCC Contact:

Chuck Powers
Director, Engineering & Technology Policy
Motorola Solutions, Inc.
1455 Pennsylvania Ave NW, Suite 900
Washington, DC 20004
Telephone: (202) 371-6900

Chuck.Powers@motorolasolutions.com

FCC Legal Counsel:

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