



December 12, 2013

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

Re: Application of Parallel Wireless, Inc. for an Experimental License, File No. 0600-EX-PL-2013, Call Sign WG9XOW

Dear Ms. Dortch:

The First Responder Network Authority ("FirstNet") consents to the application of Parallel Wireless, Inc. ("Parallel") for an experimental license to develop innovative wireless equipment using a variety of protocols and a number of frequencies, including the 758-768/788-798 MHz band. Parallel states that its innovative technology has the potential to increase network capacity and density, as well as ease of operation. Parallel requests the experimental license from November 2, 2013 to November 2, 2015.

FirstNet's concurrence is premised on experimental operations that conform to the following parameters:

- 1) At any one time, Parallel's "intelligent base stations" will be located at no more than five sites in, and within a four-kilometer radius of, Parallel's offices in Nashua, New Hampshire. Over time, Parallel expects to test 50 base stations. Any given experiment would use no more than five such base stations. In addition, Parallel expects to test up to 15 portable devices in any given experiment.
- 2) Parallel requests authority from the FCC to operate over, among other bands, the 758-768/788-798 MHz band, which is currently licensed on a nationwide basis to FirstNet.
- 3) Operation under the requested experimental license will begin when the Commission grants the request and will continue for no longer than two years.¹
- 4) Parallel has analyzed information in the FCC's license databases and states that the proposed operation would not interfere or create a significant potential for harmful interference with any public safety operations in the 700 MHz band.
- 5) Operation of the experiment will not be used in mission-critical operations or in the delivery of live transmissions in duties to protect life, property, or safety. Operations will be confined to a

¹ Parallel is now operating under a Special Temporary Authority. OET File No. 0336-EX-ST-2013, Call Sign WG9XOW.

one kilometer radius of each base station in use, for a maximum overall four- kilometer radius at any given time.

- 6) Parallel has provided an overall project manager and in case of interference issues, "stop-buzzer" contact for these experiments: Anne-Marie Dinius, Intellectual Property Counsel, Parallel Wireless Inc., 603-589-9937 x 224; adinus@parallelwireless.com.
- 7) Parallel understands that an experimental license only permits shared use of the subject radio frequencies and that it may have to coordinate with other entities licensed for experimental purposes. Parallel further understands that a separate concurrence from FirstNet will be required for any renewal of this license.
- 8) All experimental operations by Parallel will be secondary, meaning that they must not cause interference to narrowband or broadband operations authorized on a primary basis, including in the spectrum licensed to FirstNet. Narrowband or broadband operations authorized on a primary basis, including in the spectrum licensed to FirstNet, have no obligation to mitigate any interference that such primary operations may present to the Parallel experimental operations.
- 9) FirstNet has not yet deployed in the geographic area covered by this application. Parallel understands that if, during the term of this license, FirstNet or its assigns or lessees, plans to deploy in this area, Parallel may have to reduce the coverage or power levels of its experimental transmissions or cease them entirely.

FirstNet concurs with the proposed experimental license for Parallel on frequencies currently licensed to FirstNet for purposes of testing innovative solutions for wireless equipment. This consent is subject to the FirstNet's ongoing ability to monitor any operations and use of FirstNet's licensed spectrum.

Respectfully submitted,



TJ Kennedy
Deputy General Manager
First Responder Network Authority

cc: Erika Olsen, Special Counsel
Public Safety and Homeland Security Bureau
Anne-Marie Dinius, Intellectual Property Counsel
Parallel Wireless, Inc.
Rajesh Kumar Mishra, CEO
Parallel Wireless, Inc.