From: Cindy Ievers

To: Behnam Ghaffari
Date: October 26, 2021

Subject: FCC File No. 1718-EX-ST-2021

Message:

Dear Mr. Ghaffari:

To avoid any interference with CBRS use in the 3650-3700 MHz band, all of our day-to-day experimental R&D work is conducted in the 3400-3550 MHz band. Only once we've reached a development milestone where our technology has been verified to be operational at 3400-3550 MHz, do we briefly test the system at the slightly higher 3650-3700 band, just to be sure there is no subtle issue that arises at CBRS frequencies (thus far, none has).

Before we do any testing at 3650-3700 MHz, we use a spectrum analyzer to confirm that there is no detectable signal at, or adjacent to, any frequency we will use within the detectable range of our 3400-3550 MHz transmissions (since 3650-3700 MHz transmissions should propagate no farther than 3400-3550 MHz transmissions using the same power and same antennas). This confirms we know that we will not be interfering with any CBRS user. Then, we immediately do our confirmation testing in the 3650-3700 MHz band, which takes at most a few hours. After that, we return to using the 3400-3550 MHz band for continued development.

Development milestones where we briefly test in the CBRS band as described above only occur at most once every 2 or 3 months. While it is essential that we can confirm the system works in the CBRS band (since the technology will ultimately be sold for use in this band), we only use CBRS frequencies very briefly and infrequently.

Additionally, most of our development work is within SAP Center's arena at very low power. We are unable to detect our 3400-3550 or 3650-3700 MHz transmissions in the SAP Center hallways on the other side of walls that surround the arena, let alone outside of the SAP Center building beyond walls that surround the hallways. Thus, in our usage at SAP Center's arena, all transmissions are confined to the building, and SAP Center has confirmed that it will notify us before allowing any other party to use CBRS spectrum within the building.

Please let me know if there are further questions.

Fadi Saibi, PhD
Chief Technology Officer
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