

Red Rover on behalf of  
Vista Unified School District  
STA Exhibit

Date: 04/18/2017

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Subject: Complementary Exhibits  
File Number: 0087-EX-ST-2017

To Whom It May Concern:

Consistent with the standards set forth in Section 5.61 of the Federal Communications Commission's (Commission's) Rules, 47 C.F.R. § 5.61, Red Rover Ltd, on behalf of Vista Unified School District (USD), requests Special Temporary Authority (STA) to conduct demonstrations of Shared Spectrum experimental 4G LTE Cell Base Stations in Vista, California. Operations under this STA would be consistent with the Part 96 rules the Commission has adopted to govern use of the 3.5 GHz band. The STA is sought for a period of 180 days beginning on 06/01/2017. Red Rover Ltd outlines below its need for the requested STA and the reasons that the STA should be granted expeditiously.

The STA is needed to execute operation and performance of 4G LTE Cell in the 3.5 GHz band, which the Commission has designated for broader use. The operation of Cell Base Stations will be consistent with the Commission's Part 96 rules and the incumbent operators will be protected from any harmful interference. The School District of Vista wants to test the capabilities of CBRS in providing Educational broadband Internet services to low income students at home. In support of their chromebook deployments and digital educational material online. This service will enhance the students and families for Vista USD.

In Vista California, Red Rover Ltd. and Vista USD requests authorization to operate on the frequencies between 3655-3675MHz, part of 3550-3700MHz which have been opened for innovative small cell spectrum sharing in connection with the new Citizens Broadband Radio Service (CBRS). Operations across the proposed frequencies will be consistent with the rules for Category B CBRS devices (CBSDs) set forth in Part 96 of the Commission's rules. As stated above and described below, Red Rover Ltd and Vista USD will avoid harmful interference to incumbent operations throughout the band, and to operations in adjacent bands.

#### **Planned Operations**

Red Rover anticipates performing the following tests under the requested STA. The proposed experimental operations in the 3.5 GHz band will be conducted without harmful interference to other authorized users.

Red Rover Ltd.

- 4G LTE outdoor coverage and performance: Red Rover Ltd in collaboration with its Air Span radio equipment, model Air Symphony 4200 will test:
  - The operation of the Cell base station to understand the coverage and performance of indoor base stations in the 3.5 GHz band in rural environments.
    - The frequency of operation will be limited to 3655 to 3675 MHz
    - A single antenna site will be established on existing outdoor stadium light poles
    - The existing light poles will broadcast, “filter content” to students at home. The desire outcome is the ability to provide educational Internet services to low income students at home.
    - While traditional the FCC Educational Broadband Spectrum (EBS) is used for these deployments, Vista USD does not have, nor can receive new EBS allocation. The application of CBRS would open the door for other Educational Institutions to consider this new spectrum in support of their students needs.
  - The performance and operation of a CBSD when instructed by SAS to switch frequency.
  - The impact on an end user when a CBSD has switched its frequency
- SAS Management of Shared Spectrum: Red Rover, in collaboration with its SAS Administrator (Federated Wireless) and radio partner Air Span, will test spectrum sharing, including General Authorized Access (GAA) registration, CBSD spectrum grant request and SAS response, spectrum grant revocation, and simulated protection scenarios in an operation environment.

#### **Non-Interference Analysis**

Operation under the STA will not adversely impact any authorized user of RF Spectrum.

**Morphology of Test Site:** The city of Vista is located in Southern California. The location is urban and geography is mix with several tall buildings throughout the town.

The test site located at the Vista High School (1 Panther Way, Vista CA) campus. The sites have existing Stadium field lights that will be used as the radio towers. These existing structures assure no aircraft flight pattern issues.

- A single eNodeB (antenna site) at each site, will be tested providing 360 degree broadcast of the 4G LTE signal using the TDD protocol. The network will provide broadband wireless Internet service to a test bed of students.

- With the higher frequency and low transmit power, reduces the conflict to adjoining areas.

CBSD power will be limited to 47dBm/10MHz (EIRP) in alignment with CBSD's Category B specifications

**Radar Protection (Shoreline):** Vista, CA is located within the protected zone, regardless, we select the use of the 3655-3675MHz frequency to avoid any possible contention with ship born radar. Red Rover Ltd does not expect any interference to Radars that operate on the shorelines by using a frequency outside of Radar Protection range.

**Federal Government Radiolocation Facilities:** The Vista USD test bed is falls within the protected zone. To avoid any conflicts, we request 3655-3675MHz frequency to avoid any possible contention with military facilities meeting the 80 km distance requirement of the Part 96 rules.

**Ground Based Radar:** The City test bed is located outside of any ground-based radar Exclusion Zone. The STA desired frequency is 3655-3675MHz frequencies to avoid any possible contention with ground-based radar.

**International Border:** Vista is more than 1700 km from the nearest Canadian border and over 75 km from the Mexican border. Therefore, no interference to incumbent operations is expected for international operation.

**In-Band FSS Protection:** The Commission has identified in-band fixed satellite service (FSS) operations in 3600-3700MHz that require protection under Part 96. Part 96 further requires coordination with any in-band FSS operations within a 150 km coordination contour, operating within the 3650-3700MHz band. There are several FSS operations within the 150Km protection zone. The operations within the protected zone in-band frequency is 65Km from the nearest STA test site. Given the distance and low wattage, free space will assure no conflict with existing In-Band operations. Further, the location geographically sits within a valley with hills to the north, east and south. To the west if the Pacific ocean. This self-contained geographical area helps assure no possible conflict within the protection zone.

**Adjacent Band FSS Protection:** The Commission has identified adjacent band FSS operations in the 3700-4200MHz that require protection under Part 96. Part 96 requires adjacent band FSS protection within 40km of the FSS site. The closest FSS is 11Km from the center of the proposed antenna site. The proposed STA frequency of 3655 – 3675MHz will be outside of the operating spectrum of any Adjacent Band FSS operating within the 3700-4200MHz range.

Part 96 requires a blocking level of -60 dBm. Assuming Free Space path loss between a CBSD in Vista and FSS sites in Carlsbad CA (11Km distance) the blocking level of -60 dBm will not be an issue due operating on a different spectrum range that would not interfere with the FSS site operating on 3700-4200 MHz.

**Part 90 (GWBL):** A search in the FCC ULS for any GWBL license holders within 18KM of the proposed STA site indicated there are no current GWBL within the area. Based on no incumbents operating on the frequency of 3655-3675MHz, there will not be any interference with any part 90 GWBL operations in the Vista, California area.

**Exhibit B – Technical Information:**

Applicant Name: Red Rover Ltd

Applicant FRN: 0024036667

**Technical Contact Details:**

<b>Name of Contact</b>	Steve Rovarino – President Red Rover Ltd
<b>Contact Address</b>	748 South Meadows Parkway Suite A9-52 Reno, NV 89521 408-921-8945 Steve@redroverltd.com

**Base Station General Information**

<b>Equipment</b>	Air Span Air Symphony 4200 (Undergoing SAS certification process)
<b>Quantity</b>	<u>2</u>
<b>Address of Location Site 1:</b>	Vista High School 1 Panther Way Vista, CA 92084
<b>Area of Operation Site 1:</b>	Operation not to exceed 3 km radius from the following geographic center points: 33 13 21.3 N and 117 14 27.3 W


**Amplifier Detail**

<b>Antenna</b>	External
<b>Type</b>	Omnidirectional
<b>Quantity</b>	Qty 3 at each site, 120 ° coverage from each Antenna
<b>Gain</b>	17 dB
<b>Height</b>	24M
<b>Tower/Structure</b>	Antenna’s will be mounted on existing Stadium Field Lights

<b>Frequency</b>	3650-3670MHz
<b>Beamwidth at Half-Power Point</b>	60° Horizontal
<b>Orientation in Horizontal Plane</b>	0°
<b>Orientation in Vertical Plane</b>	Various (0° to -10°)

**Radio Equipment**

Radio	Modulation	Emission Designator	Bandwidth	Maximum Output Power	Maximum EIRP
<b>Air Symphony 4200 Cat B CBRS</b>	<b>Digital 64QAM</b>	<b>20M0D1D</b>	<b>20 MHz</b>	<b>2.5W</b>	<b>47 dBm/10MHz</b>

<b>AirHarmony 4000</b>	
Tx power	4 x 40 dBm (4 x 10W)
LTE Band	Band 42 , CBRS
Tx and Rx Paths	4 X 4
(per) Channel size	Up to 20 MHz LTE
Users	1024
Throughputs	TDD: 2x 120 Mbps * HW ready for 600 Mbps
Backhaul	2x Fiber (SFP) + 2x Copper Ethernet (int. iRelay, iBridge option)
Synchronization	GPS IEEE1588-2008 SyncE
Antenna Spec	1x Quad 2x X-Polar antenna



Red Rover Ltd. is submitting an application for Special Temporary Authority to test certain aspects of prospective wireless operations of Experimental Category B CBRS Radios in the 3.5 GHz band.

Respectfully submitted,  
 Steve Rovarino  
 Red Rover Ltd  
 Red Rover Ltd.

Vista Unified School District CBRS STA Request

President

Red Rover Ltd.