

**Exhibit 1: Narrative Statement**

In August 2017, the Commission approved Republic Wireless, Inc.'s ("Republic's")<sup>1</sup> request for special temporary authority ("STA") to field test wireless devices in Raleigh NC and Chicago IL.<sup>2</sup> This authorization, call sign WL9XPF, expires in February 2018. Pursuant to Special Condition 6 of its current STA, Republic respectfully requests that the Commission grant an experimental license as set forth in the accompanying Form 442 to extend the existing authorization for 24 months. In addition, Republic respectfully requests that the Commission add a third testing location, Provo UT, using the device operating parameters previously identified for Raleigh NC and Chicago IL.

Approval of Republic's application will enable it to continue to conduct field testing of a new prototype wireless device in order to obtain data about device usage in several deployment scenarios.<sup>3</sup> Republic also requests authority for field testing in Provo UT in order to obtain field test data for deployment conductions in mountainous terrain located in the western part of the United States where wireless network coverage and strength is not as consistent as the East Coast or an urban environment like Chicago.

---

<sup>1</sup> Republic Wireless is a "WiFi First" wireless service provider. *See* Richard P., *Why We're WiFi First: The Truth about Phone Calls over WiFi*, Republic Wireless (Feb. 7, 2017), <https://pwk.republicwireless.com/why-were-wifi-first-the-truth-about-phone-calls-over-wifi/>. As the Commission has recognized, "services such as Republic Wireless . . . offer their subscribers a wide range of calling plans that feature both Wi-Fi and cellular calling along with text and data plans." *Implementation of Section 6002(b) of the Omnibus Budget Reconciliation Act of 1993 et al.*, Twentieth Report, FCC 17-126, ¶ 16 n.56 (rel. Sept. 27, 2017).

<sup>2</sup> *See* Experimental Special Temporary Authorization of Republic Wireless, Inc., Call Sign WL9XPF, File No. 0980-EX-ST-2017 (granted Aug. 15, 2017).

<sup>3</sup> *See id.*

As with the current STA, Republic Wireless intends to provide a limited number of devices to employees and current Republic Wireless customers to operate, and will not charge any fees associated with the experiment. In addition, the devices will be labeled per 47 C.F.R. § 2.805(d)(2)(ii), and will be retrieved at the conclusion of the experiment.

Republic Wireless's requested authorization is highly unlikely to cause harmful interference. With respect to operations on licensed networks, while Republic Wireless has listed the uplink (end user equipment to tower) frequency ranges for several service bands for administrative convenience, devices will transmit only on the channels licensed to wireless carriers on whose networks Republic has obtained permission to operate. Republic Wireless anticipates that obtaining this consent will be a condition of operation for the experimental license. With respect to operations in the 2.4 GHz unlicensed frequency band, Republic Wireless's operations will comply with the technical requirements in Part 15 as well as Wi-Fi and Bluetooth industry standards, including the politeness protocols in those standards.

Finally, as noted on its Form 442, Republic Wireless's prototype device is incapable of station identification. Accordingly, Republic respectfully requests that the Commission exempt this authorization from the station identification requirements in 47 C.F.R. § 5.115.