

To: FCC

From: Michael Parker, CEO  
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Date: Nov 23, 2014

Subject: SUPPLEMENTAL STATEMENT required by 5.63 (d) (1)  
“A narrative statement describing how the applicant meets the eligibility criteria set forth in subpart E of this part. “

#### 1. INTRODUCTION AND GENERAL INFORMATION

I am pleased to provide information regarding Rincon Research Corporation's suitability to receive a Program Experimental License under Title 47 CFR Part 5.

Rincon Research Corp. is an employee owned company of approximately 200 people. Its main headquarters are Tucson, AZ and satellite offices are located in Centennial, CO and Chantilly, VA. It qualifies for a Program Experimental License in three categories defined cited by 5.302 Eligibility. It is a research laboratory, it manufactures specialized radio frequency equipment and it integrates radio frequency equipment into its end products. As evidence I provide the following information from our web site at [www.rincon.com](http://www.rincon.com) regarding our technical expertise to manage Experimental Programs.

“We are an incredibly vibrant organization that conceives, analyzes, designs, implements, and tests software solutions for some of the most intriguing Government projects. As a small business headquartered in Tucson, Arizona, we have a 30+ year history marked by steady growth in both revenue and customers.

Rincon's support of NASA's Space Network Ground Segment Sustainment (SGSS) program earned us the 2013 Small Business Subcontractor of the year award from the Goddard Space Flight Center. Our development of Main Mission Frontends will move NASA into the next generation of ground system solutions.

Founded in 1983, Rincon began as a small research company. Today our business is drawn from a variety of Government clients. We have diversified through the expertise of our talented staffs of scientists, engineers, programmers, writers, and support staff who continue to focus on rapidly developing technology from concept to operation. Our

digital signal processing products and services ensure successful outcomes to meet mission and business objectives.” Further information may be found on our web site that lists 12 product lines in the general area of software defined radios and FPGA-based products.

I further point out that Rincon Research has since its inception sponsored an active Internal Research and Development program involving Radio and Satellite Applications. We also cooperate with other organizations on research projects. For example, three Rincon employees were founding members of TAPR (Tucson Amateur Packet Radio). More recently, Rincon Research teamed with University of Arizona to sponsor one of the first CubeSats and is currently working with another university project.

We have sponsored University Students over the last several years to work with our researchers on topics ranging from Radio Astronomy, GPS, adaptive antennas, and satellite design.

#### ELGIBILITY 5.302 (a)

“The radiofrequency experimentation will be conducted in a defined geographic area under the applicant's control;”

The experimentation will take place on adjacent properties owned or controlled by Michael N. Parker and Carol A. Parker. Rincon Research will have access to perform and control experiments per agreement between the Parkers and Rincon Research. This property consists of approximately 100 acres of mostly undeveloped wooded and desert land in Pima county NE of Tucson spanning Sabino creek between Cloud Road and Bear Canyon Road. The Parker’s currently own over 100 acres of contiguous land where the experiment program will be conducted.

In filling out form 422 on the web site, two locations were specified for fixed towers, one at 8525 E. Cloud Road, along the western most boundary and another site along the southern boundary. We expect most of the experimentation to occur on the low-lying vacant 60 acres between these points. We will supply additional information if required once we understand what is required, e.g. tax parcel numbers, Google earth representations, etc.

#### ELGIBILITY 5.302 (b)

“The applicant has institutional processes to monitor and effectively manage a wide variety of research projects.”

Rincon Research has been in the business of performing and managing research for the US Government for 30 years. Most of our employees have advanced degrees in electrical engineering, physics, or math.

ELGIBILITY 5.302 (c)

“The applicant has demonstrated expertise in radio spectrum management or partner with another entity that has such expertise.”

Rincon research currently has several Experimental Licenses and have not caused anyone a problem.

We have extensive equipment such as spectrum analyzers, receivers, and signal capture and analysis equipment. Our work for the government in signals analysis provides our engineers with tools to understand what parts of the spectrum is being used in a specific area and to avoid interference.

A sizable fraction of the employees, including myself, are long-time hams and consequently are very familiar with spectrum management issues. We might, on occasion, approach spectrum management companies for advice. However we have a great deal of expertise and will normally perform our own analysis. If in doubt we would normally change frequencies. If this was impractical, we have the expertise to engage directly and in advance to avoid interference to local companies that might be affected by our operations.