

From: Michael Parker

To: Behnam Ghaffari

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Message:

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Dear Mr. Ghaffari,

Thank you for your inquiry.

I had difficulty in filling out the 442 form is because it appears not to be particularly applicable to the Program Experimental License.

It asks for detailed information about the experiments to be conducted over the next 5 years (e.g. frequency) that is not yet known.

The web site forced me to put something into the field in order to proceed with the electronic filing. I filled out the broad frequency range you question because it is difficult for me to project what our future experimental program needs will be. I can't even project next year at present since we haven't gone through our Independent Research and Development planning process yet. In the past we have received experimental licenses for specific frequencies ranging from HF through X-band. We are currently contemplating experiments in microwave and millimeter wave bands.

My understanding that the intent of the Program Experimental License was to allow a wide variety of different experiments subject to the minimum 10 day notification requirements of 5.309, Notification Requirements. I understood that the notification process 5.309 (a) was where the individual experiment technical details, including frequency bands, avoidance of interference analysis, etc., was to be provided. This apparent flexibility is why we are so excited about the Program License.

I would appreciate any suggestions about how we should respond while maintaining future flexibility. For example, it is not very likely that we will need to operate below 2 MHz so I could modify requested frequencies to be from 2 to 100,000 MHz. Alternatively, I could put in very restrictive parameters of one of our likely early experiments. But that would pose a difficulty if the license was only issued for the restrictive frequencies of that experiment. What would I do when need for an experiments at a very different frequency arose?

We certainly intend to abide by your rules regarding frequency as stated in 5.85 and 5.303, as well 5.309. I also note that we have the capability to monitor actual frequency usage before and during experiments. This will be part of our plan to avoid potential interference.

Finally, I note that a similar problem arose when entering the modulation and power characteristics into the web site form. Specific information was required to get the web site to accept our application. In many cases we expect to be using different modulation and weaker power. For example, one common experiment might be testing antenna patterns and multipath characteristics. Weak CW or swept CW signals would likely be more appropriate for this class of experiments.

Thanks for your consideration,
Michael Parker
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