

SUPPORTING STATEMENT

Pursuant to Section 5.3 (a), (e), (f) and (j), Section 5.51, and Section 5.61 of the Federal Communications Commission (“FCC”) rules, 47 C.F.R. §§ 5.3 (a), (e), (f) and (j), 5.51, and 5.61 (2020), Southwest Research Institute (“SwRI”) respectfully requests experimental special temporary authority (“STA”) so that it may support third-party government contract related testing of small unmanned aerial systems (“UAS”) and radar signature systems that must be relocated from other facilities due to the social distancing requirements and other complications caused by the COVID pandemic. Specifically, SwRI seeks to conduct tests on a temporary basis at its remote, rural site near Sanderson, Texas, which has the capability to support needed testing while meeting the safeguards designed to safeguard personnel during the pandemic.

SwRI currently conducts testing at its facilities located in San Antonio, Texas, under experimental radio licenses issued under call signs WD2XKF, WD2XLA, WD2XLB, WD2XLC, WF2XCH, WI2XEE and KG2XAJ, but it does not currently hold similar authorizations to conduct tests at its facilities near Sanderson, Texas. The STA requested by this application would allow SwRI to support testing for a short-term period from March 22 to April 22, 2021, to coincide with the schedule established by the government.

In addition, SwRI respectfully seeks emergency expedited treatment of this request so that it may commence tests on **March 22, 2021**. Justification for such action is attached separately in the “Emergency Request for Expedited Treatment” accompanying this application.

In support of SwRI’s request, the following is shown:

1) Company Background:

Southwest Research Institute is headquartered in San Antonio, Texas. Its address and FCC Registration Number (“FRN”) are provided below:

Southwest Research Institute

6220 Culebra Road
San Antonio, TX 78238-5166

FRN: 0004074217

SwRI is an independent, not-for-profit, applied engineering and research organization devoted to technology development and transfer. It conducts business with the industry and the government (*i.e.*, the United States and other friendly nations) on a worldwide basis. Approximately 50% of the SwRI’s business is for the U.S Government.

2) Need for Experimental Special Temporary Authority:

As noted above, SwRI seeks an STA so that it may temporarily support third-party government contract related testing that must be relocated from other facilities due to the social distancing requirements and other complications caused by the COVID pandemic. Specifically, SwRI seeks to conduct tests on a temporary basis at its facilities located at a remote, rural site near Sanderson, Texas, which has the capability to support needed testing while meeting the safeguards designed to safeguard personnel during the pandemic.

SwRI currently conducts testing at its facilities located in San Antonio, Texas, under experimental radio licenses issued under call signs WD2XKF, WD2XLA, WD2XLB, WD2XLC, WF2XCH, WI2XEE and KG2XAJ, but it does not currently hold similar authorizations to conduct test at its facilities at Sanderson, Texas. The STA requested by this application would allow SwRI to support testing for a short-term period of approximately 14 days and with a maximum of 10 hours of intermittent operation in any 24-hour period. SwRI has requested an STA for a term of 30 days (from March 22 to April 22, 2021) to provide flexibility should variations in government and contractor COVID travel requirements or issues with inclement weather arise.

3) Location of Test Site:

SwRI proposes to conduct experimental testing at its facilities at the Longfellow Ranch, near Sanderson Texas. This 400,000-acre property is located in rural west Texas at latitude 30°21'58.35"N and longitude of 102°40'49.35"W, and the operations to be conducted under the requested STA will be limited to a radius of 2 km from the center of these coordinates. From the center of the test range, the distance to the property's borders is approximately 15 km. The nearest urban areas to this range are located in Sanderson, Texas (37 km to the Southeast) with a population of 807, and Fort Stockton (58 km Northwest) with a population of 8,390. Moreover, higher terrain surrounding the test site would serve to shield these urban areas from the proposed operations. See attached Google Earth Images.

4) Frequencies Desired:

As noted above, SwRI has conducted tests under experimental radio licenses issued under call signs WD2XKF, WD2XLA, WD2XLB, WD2XLC, WF2XCH, WI2XEE and KG2XAJ covering a frequency range from 10 kHz to 18 GHz. By the instant request, SwRI seeks authority to operate on a subset of those frequencies listed in its application and in Attachment A.

SwRI acknowledges that it must operate on a secondary, non-interference basis and that the selection of different frequencies may be necessary to avoid the potential for interference. If during testing SwRI determines that there is a potential to cause interference by using a frequency within the bands listed in the Attachment A, it will operate on another frequency, provided such frequency is not within the restricted frequencies set forth in FCC Rule Section 15.205.

SwRI also recognizes that its proposed experimentation will require coordination not only with the Interdepartment Radio Advisory Committee (“IRAC”) of the National Telecommunications and Information Administration (“NTIA”), but also with existing non-Federal government licensees authorized on the requested frequencies. Accordingly, if a particular frequency or set of frequencies in any band it has requested is not available due to Federal government or non-Federal government use, SwRI would be agreeable to a restriction on, or carve out of, that frequency or frequencies as suggested by spectrum coordinators.

5) Power Levels and Duty Cycle:

SwRI will operate with the minimum necessary power to conduct its research and evaluations, but it will not to exceed the power levels specified in the application and in Attachment A.

In addition, the testing to be conducted under the requested authority will be intermittent. Transmissions will not be continuous, and they will occur for a period of 10 hours or less during any 24-hour period.

Moreover, as noted above, SwRI expects the tests to be completed over a period of only 14 days during the term of the STA. It has requested an STA for a term of 30 days (from March 22 to April 22, 2021) to provide flexibility should variations in government and contractor COVID travel requirements or issues with inclement weather arise.

6) Type of Emission, Modulation Technique, and Bandwidth Required:

Operations will be conducted primarily with the emissions and modulation techniques specified in the application and in Attachment A. If other emission modes and modulation techniques are utilized, in no event will the emissions extend beyond the frequency bandwidths or bands requested.

SwRI does not propose to supply station identification as set forth in Section 5.115 of the Commission's Rules, 47 C.F.R. § 5.115 (2020),

7) Equipment To Be Used:

SwRI proposes to deploy not more than a total of three (3) temporary fixed base station units during the experimentation. Currently, it proposes to operate the following devices:

- a) RPS-42 Radar (a radiolocation system that will not be used for radio navigation)
- b) StreamCaster 4200 (for communication between the UAS and a controller).
- c) Genius MK1 (software defined radio)

8) Antenna Information and Compliance with Human Exposure Limits:

SwRI will comply with all Federal Aviation Administration (“FAA”) and FCC rules and regulations regarding the installation and operation of antennas and their support structures. The antennas to be deployed under the authority requested will typically not extend more than six meters above ground or more than six meters above a building, but in no case will they extend more than ten meters above ground level.

All power levels will comply with the limits set forth in the FCC’s rules, including those relating to human exposure to radiation. In addition, all personnel who will operate the equipment are knowledgeable as to the effects of RF energy and will have the ability to control their exposure.

9) Restrictions on Operation:

SwRI understands that other stations may be licensed on the channels it has requested and that, if any interference occurs, it may be required to discontinue its operations immediately. SwRI does not expect such interference to occur, however, as its tests will be conducted only on a limited basis as described above in a remote rural area that is shielded by surrounding terrain

SwRI also recognizes that: (a) permission to operate has been granted under experimental authority issued by the Federal Communications Commission, is strictly temporary, and may be cancelled at any time and that (b) operation is subject to the condition that it not cause harmful interference.

Moreover, SwRI does not propose to market, sell, or lease unapproved equipment to end users or conduct a market study in conjunction with this test. After the completion of the tests, SwRI will recall and recover all devices that do not comply with FCC regulations. If any different treatment becomes necessary during the course of its experimentation, SwRI will seek separate and additional authority from the agency.

10) Interference Protection/Stop Buzzer Contact Information:

As noted above, SwRI recognizes that the operation of any equipment under experimental authority must not cause harmful interference to authorized facilities and that this application may need to be coordinated by the FCC with IRAC/NTIA. Should interference occur, SwRI will take immediate steps to resolve the interference, including if necessary, arranging for the discontinuance of operation. Notwithstanding these precautions, SwRI believes that its experimental operations are unlikely to cause interference. It proposes to limit the power and transmitting times of the proposed tests to the minimum necessary to conduct its evaluations and the operations will be limited to temporary fixed locations within a 2 km radius of the center coordinates specified in the application.

SwRI advises the FCC that Dr. Cris Lewis is the technical contact for this request and that he will serve as the “stop buzzer” in the event that operations must be terminated because of any interference concerns. He can be reached at telephone: (210) 522-3471; email: cris.lewis@swri.org

11) Contact Information:

Company Contact:

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Technical and "Stop Buzzer" Contact:

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ATTACHMENT A

PROPOSED FREQUENCIES

As noted in the accompanying “Supporting Statement,” SwRI has conducted tests under experimental radio licenses issued under call signs WD2XKF, WD2XLA, WD2XLB, WD2XLC, WF2XCH, WI2XEE and KG2XAJ covering a frequency range from 10 kHz to 18 GHz. By the instant request, SwRI seeks authority to operate on a subset of those frequencies listed in the table below on a temporary basis at its remote, rural test site near Sanderson, TX.

SwRI acknowledges that it must operate on a secondary, non-interference basis and that the selection of different frequencies may be necessary to avoid the potential for interference. If during testing SwRI determines that there is a potential to cause interference by using one or more of the frequencies listed in the Attachment A, it will operate on other channels, provided such channels are not within the restricted frequencies set forth in FCC Rule Section 15.205.

SwRI also recognizes that its proposed experimentation may require coordination not only with Interdepartment Radio Advisory Committee (“IRAC”) of the National Telecommunications and Information Administration (“NTIA”), but also with existing non-Federal government licensees authorized on the requested frequencies. Accordingly, if a particular frequency or set of frequencies in any band it has requested is not available due to Federal government or non-Federal government use, SwRI would be agreeable to a restriction on, or carve out of, that frequency or frequencies as suggested by spectrum coordinators

Frequencies	Emission Designators	Modulation Technique	ERP (Mean)
420MHz-460MHz	25K0FXN	AWGN, FM, FSK	10 Watts
902MHz-928MHz	300K0FXN	AWGN, FM, FSK	
2400MHz-2485MHz	10M0WXN	AWGN, FM, QPSK, OFDM	
5725MHz-5850MHz	20M0WXN	AWGN, FM, QPSK, OFDM	
4400MHz-4940 MHz	5M64D7W	OFDM	4 Watts
	11M3D7W	OFDM	
	22M6D7W	OFDM	
3300MHz-3400MHz	43M0M1N	Coded Pulse Radar	328 Watts
	21M5M1N	Coded Pulse Radar	
	5M50M1N	Coded Pulse Radar	
	4M40M1N	Coded Pulse Radar	
	3M70M1N	Coded Pulse Radar	
	17M6M1N	Coded Pulse Radar	
	14M7M1N	Coded Pulse Radar	
	11M0M1N	Coded Pulse Radar	
	8M80M1N	Coded Pulse Radar	
7M30M1N	Coded Pulse Radar		

US385 and 194
Fort Stockton

7

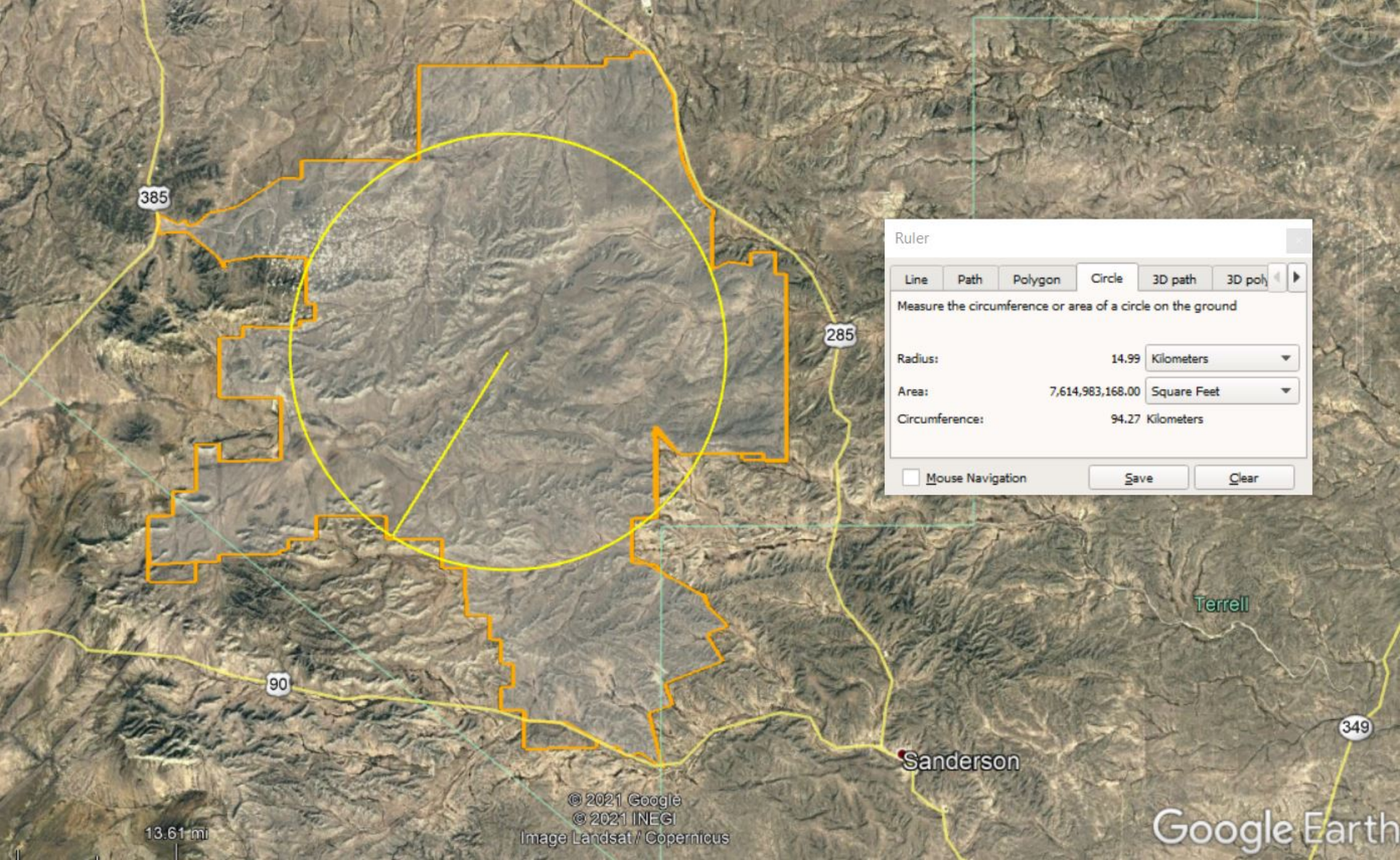
385

285

90

Sanderson





Ruler

Line Path Polygon **Circle** 3D path 3D poly

Measure the circumference or area of a circle on the ground

Radius: 14.99 Kilometers

Area: 7,614,983,168.00 Square Feet

Circumference: 94.27 Kilometers

Mouse Navigation

385

285

90

349

Sanderson

Terrell

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Google Earth

13.61 mi