

## NARRATIVE STATEMENT

By this application, and pursuant to Section 5.71(a)(2) of the Federal Communications Commission's ("FCC") Rules, 47 C.F.R. § 5.71(a)(2), Starry Spectrum LLC ("Starry") respectfully seeks renewal of the experimental authority granted by the FCC under call sign WI2XEB. This license allows Starry: (a) to evaluate the functionality, reliability and user acceptability of equipment and technologies it is designing and developing to support new and innovative point-to-point and point-to-multipoint communications capabilities; and (b) conduct market studies on a limited basis. In compliance with the conditions of that license, Starry filed experimental reports detailing the results of its tests to date with the FCC.<sup>1</sup>

As described in its experimental reports, Starry's tests and operations under the license have been instrumental to informing the development of Starry's innovative fixed wireless technology and its potential business models. However, its technology is still nascent, and it has generated a data set for potential business models over a limited timescale. Granting the application will further allow Starry to innovate and improve its technology, continue its research and development of new technology and deployment models for this band, generate more business and technical data on its existing operations, experiment in markets with different characteristics, and test different business models.

Starry understands and acknowledges that any operation under its license would be subject to the same conditions imposed upon its current experimental operations and that the FCC may specify additional conditions that it deems appropriate. For example, and as discussed in greater detail below, Starry will advise participants that: (a) the operations are being conducted under an experimental authority issued to Starry; (b) the company is responsible for the experimental activities; (c) all operations are being conducted on a non-interference basis; and (d) after the test is complete, Starry will retrieve and recover all devices that do not comply with FCC regulations.

In addition, Starry recognizes that the 37.6-38.6 GHz band ("Upper 37 GHz Band") will be auctioned in FCC Auction 103, starting December 10, 2019.<sup>2</sup> Starry agrees that it will cease any operation in the Upper 37 GHz Band as authorized under this license in any location listed below in which a license is granted in the relevant Partial Economic Area pursuant to the completion of Auction 103.

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<sup>1</sup> See Second Experimental Report, ELS File No. 0072-EX-CM-2016, Post-Grant Exhibits (filed Dec. 6, 2017); Third Experimental Report, ELS File No. 0072-EX-CM-2016, Post-Grant Exhibits (filed Feb. 15, 2019).

<sup>2</sup> Incentive Auction Of Upper Microwave Flexible Use Service Licenses In The Upper 37 GHz, 39 GHz, And 47 GHz Bands For Next-Generation Wireless Services, Notice And Filing Requirements, Minimum Opening Bids, Upfront Payments, And Other Procedures For Auction 103, *Public Notice*, AU Docket No. 19-59, GN Docket No. 14-177, FCC 19-63 (rel. July 11, 2019).

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