

JUSTIFICATION FOR FIVE-YEAR EXPERIMENTAL LICENSE

As described in the accompanying “Narrative Exhibit,” TransCore, LP respectfully requests experimental authority to test a non-multilateration vehicle identification tag reader system under development by the company for operation overseas in the 865 - 868 MHz band. Specifically, the system is being developed and manufactured for export and deployment in Europe to support the rail industry and will not be marketed for use in the United States.

A. Justification for 5-Year License:

TransCore seeks a five-year license to accommodate ongoing tests of equipment that are expected to change or evolve over the next five years (or longer) as a result of TransCore’s research and development. As a pioneer and leading supplier of vehicle identification systems, TransCore anticipates receiving many new orders, some of which may trigger a requirement to conduct re-qualification testing on an unanticipated and expedited basis during the term of the experimental license. For example, its devices are typically offered and manufactured for a period extending for a decade or more, yet component suppliers often change the characteristic of their components and sometimes discontinue components, requiring TransCore from time to time to requalify the devices. Re-qualification testing might also be required when users request that TransCore modify the technical aspects or functionality of equipment. Such tests would be conducted occasionally and for limited durations, however, which would minimize the potential for any harmful interference. A five-year experimental license will accommodate such activities over the expected lifetimes of the products under test.

B. Public Interest Statement:

TransCore submits that issuance of a five-year license is in the public interest, convenience, and necessity, as it will allow it to test devices that will promote safe and efficient operations in the rail industry. Moreover, grant of the authority will permit TransCore to continue developing innovative equipment over expected product lifetime periods of much longer than two years. Thus, grant of a five year license, rather than requiring more frequent renewals, is in the public interest, as it will reduce administrative burdens on both the company and the Commission.