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COASTAL AND MARINE SCIENCES INSTITUTE BODEGA MARINE LABORATORY P.O. Box 247 / 2099 WESTSHORE ROAD BODEGA BAY, CALIFORNIA 94923

April 23, 2021

Federal Communications Commission Office of Engineering and Technology 445 12th Street, SW Washington, DC 20554

To Whom It May Concern,

The University of California, Davis Bodega Marine Laboratory (the license applicant), operates and maintains 12 SeaSonde High Frequency Radar (HFR) stations as part of the Central and Northern California Ocean Observing System (CeNCOOS), one of eleven regional associations funded by the NOAA IOOS program office to provide coastal oceanographic data for a variety of government and societal stakeholders. The nationwide HFR network of approximately 170 stations provides critical ocean surface current maps to NOAA and the United States Coast Guard (USCG) for planning search and rescue missions and spill response in addition to other maritime domain awareness purposes and users.

The goal of this ELS application is to begin the transition of these 12 existing stations, which have been operating for more than a decade, to the ITU designated bands for oceanographic HFR outlined in FCC order 17-33 (March 27, 2017). The 12 stations in this application (file 0361-EX-CN-2021) have been operating under a variety of existing licenses/approvals, including file 0095-EX-RR-2016 and some NOAA ORFM frequency assignments. Each antenna registered has the two nearest ITU bands associated with it that will allow it to continue to provide the data necessary to continue to meet mission objectives.

University of California, Davis Bodega Marine Laboratory will collaborate with the manufacturer, CODAR Ocean Sensors, and Freedom Technologies Inc. (FTI) a NOAA contractor, and other regional operators, to perform tests at existing HFR stations to prepare for transition and participation in the national channeling plan being developed by FTI:

- 1. Identify the optimal ITU band at each station to continue to provide the best performance and to meet the needs of users of the surface current maps
  - Characterizing RFI environment within the ITU bands at each stations
  - Measuring performance of existing equipment at each station for the appropriate bands
  - Once the proper frequencies are identified, each operator will need to determine if their equipment needs to be returned for retuning

- 2. At each station, waveform parameters need to be adjusted such as modulation multiplexing timing, sweep rates and pulse/gate timing in order to be synchronized with all other stations on the same band/channel to avoid interference
- 3. Determine the best channeling configuration that will work for all systems to operate simultaneously on the limited ITU bands
- 4. Determine proper timing of call sign station identification by the HFR station and ensure that it does not impact the data

These tests must be performed incrementally and while still providing continuous measured ocean surface currents to NOAA and the United States Coast Guard. It is requested that the expiration of this ELS is the end of March 2022, when all HFR systems are expected to be in compliance with FCC order 17-33.

Sincerely,

Deirdre Shideler

Project Technician

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