From: Christopher Imlay

To: Behnam Ghaffari Date: January 16, 2014

Subject: FCC File No. 0015-EX-ST-2014

## Message:

The justification for specifying 500 transponders rather than 50 is that the proposed application is a precise radiopositioning system that has been designed for sailboat racing. It determines the exact location of each sailboat in the race. To do this, it uses multiple, very low power transmitters per boat at various locations on each boat, and there are six racecourses in use at once at the test event in Biscayne Bay. This system cannot function with fewer than the specified number of boat-mounted transmitters. If the Commission requires a detailed specification of this proprietary system, detailing the method of it will be provided on a confidential basis.