United Wireless Communications, Inc. FCC Form 442 File No. 0761-EX-CN-2017 September 20, 2017 REDACTED Narrative Statement

## Exhibit 3

#### **REDACTED Narrative Statement**

Pursuant to Sections 5.51 and 5.53 of the Commission's Rules,<sup>1</sup> United Wireless Communications, Inc. ("United Wireless") respectfully requests an experimental license to operate in the Educational Broadband Service ("EBS") spectrum to combine with its existing Broadband Radio Service ("BRS") spectrum in Ford County, Kansas<sup>2</sup> to provide [REDACTED FOR PUBLIC INSPECTION]. Working with its technology partner, Huawei Technologies Co., Ltd. ("Huawei"), United Wireless proposes [REDACTED FOR PUBLIC INSPECTION].

The following provides more details for this request:

## 4. Purpose of Operation and Need for Experimental License

United Wireless is a provider of wireless telecommunications services in predominately rural areas of southwest Kansas. The experimental authority requested will allow the company to test and demonstrate the performance and feasibility of providing [REDACTED FOR PUBLIC INSPECTION] in its existing BRS spectrum.

# 5. <u>Location of Proposed Operation</u>

United Wireless proposes to conduct the proposed tests using one (1) base station transmitter and antenna that will be installed at a temporary fixed location within the immediate area of Spearville, Kansas. A map of the proposed location in which the base station will be installed is provided below:



Specifically, its base stations will be located at 104 East Avenue A in Spearville, Kansas.

<sup>&</sup>lt;sup>1</sup> 47 C.F.R. §§ 5.51 and 5.53.

<sup>&</sup>lt;sup>2</sup> United Wireless is currently the licensee of BRS spectrum in Ford County, Kansas under the call sign WQYL678 (granted Oct. 27, 2016/ expiration Mar. 28, 2026).

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# 6. <u>Technical Specifications</u>

### F. Frequencies Desired

United Wireless requests authorization to operate in the in the 2502-2568 MHz and 2572-2602 MHz EBS bands.

#### **G.** Effective Radiated Power

All power levels will comply with the limits set forth in the Commission's Rules, including those relating to human exposure to radiation. The units to be deployed are configured to operate at a power level of 67 dBm effective radiated power ("ERP"). United Wireless will vary the actual powers within the maximums noted above to test coverage results.

In addition, United Wireless will evaluate environmental considerations to ensure compliance with Section 1.1307 of the Commission's Rules,<sup>3</sup> and in particular, the human exposure requirements set forth in FCC OET Bulletin No. 65.

#### H. Modulation and Emissions

The primary emission designator for these operations is 40MOD7D. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequency bands requested.

## I. Antenna Information

The fixed base station transmitter antenna will be located outdoors. The antenna elevation above ground level will be no greater than 15.25 meters. The antenna will be mounted on an existing tower. The antenna will not be mounted in a fashion that will require approval under FAA and FCC rules and regulations.

## J. Equipment to be Used

United Wireless expects that it will be able to conduct its tests and evaluations with a maximum of one (1) base station. In addition, as noted above, United Wireless will limit the power, area of operation, and transmitting times to the minimum necessary to evaluate the equipment and experimental technology proposed herein.

## 3. Interference Mitigation

United Wireless has reviewed the FCC's Universal Licensing System (ULS) database, and could not identify any wireless license operating within the 2502-2568 MHz and 2572-2602 MHz EBS bands in the proposed areas of operation. Nevertheless, United Wireless is well-aware of its

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<sup>&</sup>lt;sup>3</sup> 47 C.F.R. § 1.1307.

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obligations pursuant to Part 5 of the Commission's Rules to avoid interference to co-channel licensees in non-experimental services, and will take any and all steps necessary to ensure compliance with this obligation. Furthermore, United Wireless advises that Todd Houseman, General Manager/Chief Executive Officer (contact information provided below), will act as a "stop buzzer" if any issues regarding interference arise during testing.

## 4. Contact Information

For questions regarding this application, please contact:

## **Company Contact:**

# **Legal Counsel:**

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For the foregoing reasons, United Wireless respectfully submits that the issuance of an experimental license as requested herein is in the public interest, convenience, and necessity, and will contribute to development, extension, expansion, or use of the radio art.