

From: Myron Fanton

To: Leann Nguyen

Date: May 06, 2021

Subject: Request for Info - File # 0088-EX-CM-2021

---

Message:

Our request for authorization covers a broad range of frequencies, and the license holders are very important to us &ndash; they are our customers and our neighbors. We have and will continue to minimize interference and coordinate our experimental use of the spectrum.

Pertaining to the WTB/Mobility Division enquiry about coordination within the CBRS frequencies 3550-3700 MHz:

Our radio equipment is not a Citizens Broadband Radio Service Device (CBSD) and cannot register with the Spectrum Access System (SAS). Therefore, coordination is achieved outside the SAS: since CBRS licenses are within the ULS, a license search within a 200km radius of our transmit location will yield license holder and coordination information. None of the CBRS Auction-winning license holders listed in DA-21-498 are within 200km of our transmitters, and we will continue to monitor the FCC databases to coordinate this spectrum.

CPI will avoid causing interference to incumbent and commercial operations in the band, including General Authorized Access (GAA), indeed all users of the spectrum by employing good engineering practice. First, the ERP requested by our application is 87W, representing the maximum our testing requires for the largest of our antennas, but in our testing practice we use the minimum ERP needed for the experiment. What&rsquo;s more, our testing location is remote, making the nearest licensed incumbent operator over 15km distant, and the received signal at their site is less than -135dBm. Even if this signal level were below the noise floor of a GAA receiver, our emissions are narrow-band, single frequency unmodulated carriers that degrade the received far less than the other CBSD devices or white-noise sources in the band.

Pertaining to the WTB/Mobility Division enquiry about coordination within the 3700-4200 MHz band:

Likewise, CPI will avoid causing harmful interference to incumbent operators in this band, including FSS earth stations by employing good engineering practice and frequency coordination. At the time of our application, none of the callsigns of the registered, protected FSS Earth Stations are within 200km of our transmit locations. In our testing, we strive to use the minimum ERP, and testing in this band is seldom at the peak ERP of 87W.