

Exhibit A – Narrative and Justification

Vivint Wireless received a Market Trial grant in May of 2018 and a one-year renewal on February 7, 2019. The renewal grant includes a unique special condition that the market trial will not be renewed. At that time, however, it was expected that CBRS would be ready for commercial operations in mid- to late-2019. Unfortunately, as of the date of this filing, CBRS commercial operations have not yet begun, and remain unlikely to begin until later in 2020.

During the past year, Vivint Wireless also encountered unforeseen technology challenges that necessitate further testing and development of the instant trial network. Most significantly, Vivint Wireless had been testing a particular model of equipment for which submission by the manufacturer was anticipated under the Part 96 rules. But, the underlying manufacturer ultimately opted to submit a different model of equipment for Part 96 certification. As a result, Vivint Wireless needs more time to thoroughly evaluate the model submitted to the FCC test lab for Part 96 certification. In addition, Vivint Wireless has been actively working with the same equipment manufacturer to obtain greater stability and performance from the manufacturer's firmware intended for use in Part 96 devices. Vivint Wireless has found that this firmware is not as mature and stable as the previous, non-certified versions and has been endeavoring to resolve the issues to ensure the more recent version of the firmware achieves the necessary performance and stability.

Because of the above-described technology challenges, Vivint Wireless needs additional time to deploy and operate the trial network to evaluate the equipment and technology under stress and in dense, simulated real-world scenarios. The challenges have prevented Vivint Wireless and its partners from sufficiently validating CBRS for competitive fixed wireless residential services. Accordingly, Vivint Wireless seeks additional time to proceed with testing under its market trial authority.

In addition, Vivint Wireless will not be in a position to transition market trial participants from non-Part 96 certified equipment to certified Part 96 equipment under its current market trial grant because of the delay in CBRS commercial operations and the technology challenges described above. Vivint Wireless would like additional time to complete its market trial so that it can prevent any service disruption to market trial participants as equipment is transitioned.

For the foregoing reasons, Vivint respectfully requests that the Commission expeditiously grant the requested renewal of the existing experimental license for a period of 12 months. Such action will permit Vivint Wireless to complete a robust market trial to stress the equipment and technology to be Part 96 certified for a sustainable period of time. The requested grant will allow Vivint Wireless sufficient time to test equipment and provide equipment replacements to market trial participants as equipment is transitioned to ensure continuity of service.