

EXHIBIT A – NARRATIVE DISCUSSION AND STA JUSTIFICATION

Pursuant to Section 5.61(a)(1) of the Commission’s Rules, Vivint Wireless, Inc. (“Vivint”) provides this narrative statement in support of its request for Special Temporary Authorization (“STA”) to conduct operational testing using 3550-3700 MHz Citizens Broadband Radio Service (“CBRS”) spectrum in Maricopa County, Arizona and Salt Lake County, Utah.¹ Vivint seeks STA for a period of six (6) months beginning as soon as possible but not later than January 17.²

Consistent with Commission Rules, “good cause” exists to support grant of the requested STA.³

¹ 47 CFR § 5.61(a)(1).

² *Id.*

³ 47 CFR § 5.61(a)(2).

⁴ Commercial deployment of CBRS devices cannot occur prior to certification of at least one SAS administrator given the need to enable geolocation capabilities to protect incumbent coastal radar systems.

⁵ The FCC has designated the NTIA-ITS to undertake certification testing. The FCC remains responsible for the ultimate grant of certification.

⁶ Contributions to the WinnForum are voluntary, and no enforcement mechanism exists if a member fails to submit a deliverable.

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Maricopa County and Salt Lake County represent optimal STA test sites for CBRS 3550-3700 MHz spectrum. Both test sites enjoy flat topographies that facilitate line-of-sight transmission with minimal links. Moreover, Vivint has an extensive presence in both metropolitan areas, which will facilitate the installation and maintenance of equipment under test.

Vivint's proposed tests do not represent an interference threat to incumbent operations. Both test sites are located hundreds of miles from coastal radar operations, far outside Part 96 exclusion zones. No international ground stations requiring protection in the 3650-3700 MHz band operate in Arizona or Utah.⁷ Vivint will coordinate with Wireless Broadband Services ("WBS") operated under Subpart Z of the Commission's Part 90 Rules.⁸ Vivint will also comply

⁷ See <https://transition.fcc.gov/bureaus/ib/sd/3650/grandftr.pdf> (last visited 11/9/2017).

⁸ See 47 C.F.R. §§ 90.1301, *et seq.*

with the power levels in Section 96.41. As described in Exhibit B, Vivint will also provide a 24/7 point of contact with “kill switch” capability in the unlikely event of harmful interference with incumbent users.

Exhibit B provides the unit volume and technical characteristics for each STA test site proposed by Vivint for the instant application. Vivint requests authority for the minimal number of devices needed to evaluate the viability of the 3550-3700 MHz to support a high-density deployment of fixed wireless devices.

Grant of this STA will not affect possible rule changes currently pending before the Commission, and all equipment proposed to be used by Vivint pursuant to this STA complies with all existing and proposed future CBRS rules.

For the foregoing reasons, Vivint respectfully requests that the Commission expeditiously grant the requested STA.