

COLE, RAYWID & BRAVERMAN, L.L.P.

ATTORNEYS AT LAW

SECOND FLOOR

1919 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006-3458

(202) 659-9750

ALAN RAYWID  
(1930-1991)

OF COUNSEL  
FRANCES J. CHETWYND

FACSIMILE  
(202) 452-0067

INTERNET  
WWW.CRBLAW.COM

WRITER'S DIRECT DIAL  
(202) 828-9805

WRITER'S E-MAIL ADDRESS  
JDODGE@CRBLAW.COM

JOHN P. COLE, JR.  
BURT A. BRAVERMAN  
ROBERT L. JAMES  
JOHN D. SEIVER  
WESLEY R. HEPPLER  
PAUL GLIST  
DAVID M. SILVERMAN  
JAMES F. IRELAND, III  
STEVEN J. HORVITZ  
CHRISTOPHER W. SAVAGE  
ANN FLOWERS  
ROBERT G. SCOTT, JR.  
SUSAN WHELAN WESTFALL  
THERESA A. ZETERBERG  
KARLYN D. STANLEY  
JOHN DAVIDSON THOMAS  
JOHN C. DODGE  
FREDERICK W. GIROUX  
GEOFFREY C. COOK\*  
MARIA T. BROWNE  
DONNA C. RATTLEY  
THOMAS SCOTT THOMPSON  
ADAM S. CALDWELL  
SANDRA GREINER  
JAMES W. TOMLINSON  
MARK S. KRISTIANSEN†

July 10, 1998

\*ADMITTED IN MASSACHUSETTS ONLY  
†ADMITTED IN MARYLAND ONLY

Federal Communications Commission  
Experimental Radio Service  
P.O. Box 358320  
Pittsburgh, PA 15251-5320

Re: **CONFIDENTIALITY REQUEST**  
**Worldwave Communications, Inc., File No. 6199-EX-PL-1998 FCC Form 442**  
**Application for New Experimental Authorization Under Part 5 of FCC**  
**Rules for Nebraska, Colorado**

Dear Madam or Sir:

On June 22, 1998, undersigned counsel submitted an application for an experimental radio service license on behalf of Worldwave Communications, Inc. ("Worldwave"). Worldwave requested confidential treatment by the Commission of a certain attachment to its filing, pursuant to Sections 0.457(d) and 0.459 of the Commission's rules. Enclosed with this letter is a check payable to the Commission in the amount of \$45.00 to cover the confidentiality request for the June 22, 1998 application.

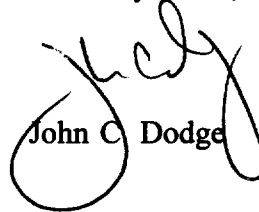
As explained in the previous filing, Attachment D to Exhibit No. 1 of the application provides answers to the requested information under FCC Form 442. This attachment describes in detail the proprietary algorithm developed by Worldwave that enables

Federal Communications Commission  
July 10, 1998  
Page -2-

its frequency hopping spread spectrum system to recognize other users within the spectrum band. Worldwave's technology and associated software is unique and may qualify for a patent. Accordingly, the Commission is justified in granting this request for confidential treatment.

Any questions regarding this matter may be directed to the undersigned.

Sincerely yours,



John C. Dodge

cc: Nancy Hey, OET

*Amendment to w/d w/H public*

**COLE, RAYWID & BRAVERMAN, L.L.P.**

ATTORNEYS AT LAW

SECOND FLOOR

1919 PENNSYLVANIA AVENUE, N.W.

WASHINGTON, D.C. 20006-3458

(202) 659-9750

ALAN RAYWID  
(1930-1991)

OF COUNSEL  
FRANCES J. CHETWYND

FACSIMILE  
(202) 452-0067

INTERNET  
WWW.CRBLAW.COM

JOHN P. COLE, JR.  
BURT A. BRAVERMAN  
ROBERT L. JAMES  
JOHN D. SEIVER  
WESLEY R. HEPPLER  
PAUL GLIST  
DAVID M. SILVERMAN  
JAMES F. IRELAND, III  
STEVEN J. HORVITZ  
CHRISTOPHER W. SAVAGE  
ANN FLOWERS  
ROBERT G. SCOTT, JR.  
SUSAN WHELAN WESTFALL  
THERESA A. ZETERBERG  
KARLYN D. STANLEY  
JOHN DAVIDSON THOMAS  
JOHN C. DODGE  
FREDERICK W. GIROUX  
GEOFFREY C. COOK\*  
MARIA T. BROWNE  
DONNA C. RATTLEY  
THOMAS SCOTT THOMPSON  
ADAM S. CALDWELL  
SANDRA GREINER  
JAMES W. TOMLINSON  
MARK S. KRISTIANSEN†

July 31, 1998

\*ADMITTED IN MASSACHUSETTS ONLY  
†ADMITTED IN MARYLAND ONLY

Mr. Carl Huie, Electronics Engineer  
Experimental Radio Licensing Branch  
Office of Engineering and Technology  
Federal Communications Commission  
2000 M Street, N.W.  
Room 286  
Washington, DC 20554

**Re: Worldwave Communications, Inc., File No. 6199 - FCC Form 442  
Application for New Experimental Authorization Under Part 5 of FCC  
Rules for Nebraska, Colorado**

Dear Mr. Huie:

Pursuant to your telephone conversation on July 24, 1998 with my associate Brian Josef, please consider this letter a formal request to amend the above-referenced experimental radio license application for Worldwave Communications, Inc. In order to expedite the processing of Worldwave's application before its Special Temporary Authority expires on August 18, 1998, the undersigned respectfully requests to withdraw Attachment D requiring confidential treatment.

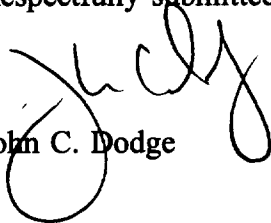
Enclosed herein please find the requested information from the application under Item 4, Particulars of Operation.

Mr. Carl Huie  
July 28, 1998  
Page -2-

- **Frequency:** Worldwave's experimental wireless local loop (WLL) system operates at 2400 - 2483.5 MHz.
- **Power:** The authorized power output equals 1 W (this 1 W measurement applies to the maximum R.F. output power at the transmitter terminals, the maximum effective radiated power from the antenna, and the mean or peak power levels).
- **Emission Designator:** Worldwave's WLL system utilizes a spread spectrum transmitter classified by the Commission as "XXX." Worldwave classifies its transmission as a digital NRZ format.
- **Modulation:** Worldwave employs binary frequency key shifting. The baud rate is equal to the burst bit transmission rate of 93 kbps. The system utilizes ITU G.721 32 kbps ADPCM. The modulation index equals 0.7 and is used to determine the deviation from the carrier frequency by multiplying this index times the burst bit transmission rate:  $0.7 * 93 \text{ kbps} = 65.1 \text{ kHz}$ . Thus, the frequency deviation of the carrier is 65.1 kHz. The bit duration for Worldwave's WLL system is equal to  $1/93 \text{ kbps}$ . Data is formatted into packets of 144 bits going from the base to the remote station and 148 bits going from the remote station to the base. Each frame consists of one (1) transmit packet and one (1) receive packet, while the frame duration is 4 milliseconds.
- **Necessary Bandwidth:** Because Worldwave's system utilizes uncoordinated frequency hopping and adaptation to avoid collisions among users pursuant to 47 C.F.R. § 15.247, the signal may be anywhere within the 2400 - 2483.5 MHz range at any given time.

Should there be any questions concerning the above information, please contact undersigned counsel.

Respectfully submitted,

  
John C. Dodge

cc: Nancy Hey, OET