



September 10, 2018

**VIA ELECTRONIC FILING**

Attn: Anthony Serafini  
Experimental Licensing Branch  
Office of Engineering and Technology  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Request to Modify Experimental Special Temporary Authorization (“STA”)  
File No. 1249-EX-ST-2018, Call Sign WM9XHE**

Dear Mr. Serafini:

Wireless Everywhere LLC d/b/a Wave Wireless (“Wave Wireless”) respectfully seeks to modify its existing experimental special temporary authorization (“STA”)<sup>1</sup> by updating the location of its temporary operations. Currently, Wave Wireless has authority to test equipment and services in Citizens Broadband Radio Service (“CBRS”) spectrum from 3650-3700 MHz at two (2) indoor locations in Washington, DC.

Wave Wireless continues to successfully assess and validate the technical and commercial viability of certain Citizen Broadband Radio Service Devices (“CBSDs”) in the 3650-3700 MHz band at Station Location 1.<sup>2</sup> In order to maximize its trial activities, Wave Wireless seeks to update the existing Station Location 2<sup>3</sup> to a similar indoor facility in Washington, DC:

New Geographical Coordinates: 38°52' 36.9” N, 77°00'23.3” W

The updated Station Location 2 will permit testing and demonstrations at a state-of-the-art building in Washington, DC that supports key enterprise clientele and future commercial deployment opportunities. Grant of this modification will serve the public interest by allowing Wave Wireless and its partners to validate opportunities made available by CBRS spectrum sharing framework in real-world conditions using CBRS-compatible equipment. The new Station Location 2 will further demonstrate the capabilities of this innovative new spectrum sharing framework and promote practical implementation of CBRS spectrum.

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<sup>1</sup> See Wireless Everywhere LLC d/b/a Wave Wireless, File No. 1249-EX-ST-2018, Call Sign WM9XHE (expires on February 15, 2019) (“*Wave Wireless STA*”).

<sup>2</sup> *Id.* (geographic coordinates: 38°54' 57.0” N, 77°02'46.0” W).

<sup>3</sup> *Id.* (geographic coordinates: 38°54' 0.03” N, 77°01'54.0” W).



No other information provided in support of the *Wave Wireless STA* is changing as a result of this modification request. Wave Wireless will continue to adhere to the terms and conditions of the *Wave Wireless STA* and operate in compliance with the existing approved CBSD operating parameters. Moreover, Wave Wireless will continue to conduct testing in highly controlled field environments at power limits and out-of-band emission limits that comply with the Part 96 rules for Category A CBSDs and End User Devices.<sup>4</sup>

In anticipation of the Commission's final CBRS rulemaking, authorization to test at the updated Station Location 2 is critical to allow Wave Wireless to further demonstrate the commercial opportunities associated with CBRS. At the conclusion of the experimental STA term, Wave Wireless will either transition to Part 96 GAA if the equipment is certified and authorized under GAA rules, or will cease operations in 3650-3700 MHz band.

Given the low EIRP levels of the CBSDs and the enclosed trial environments, Wave Wireless anticipates no harmful interference to existing incumbent users operating in the 3650-3700 GHz band. As discussed, Wave Wireless has full access to the transmit locations and has personnel nearby to monitor construction and operation to ensure that there will be no harmful interference to incumbent users and to remedy harmful interference in the unlikely event it occurs. In any event, Wave Wireless agrees to accept interference from incumbent users and will immediately terminate its operations in the event it receives reports documenting harmful interference to other authorized spectrum users in the band. During the STA, requests to cease transmissions during the license term should be directed to: [imranh@wavewireless.co](mailto:imranh@wavewireless.co).

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jason Davila", written over a circular stamp or seal.

Jason Davila  
General Counsel, Wave Wireless

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<sup>4</sup> See generally *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550–3650 MHz Band*, Report and Order and Second Further Notice of Proposed Rulemaking, GN Docket No. 12-354, ¶ 73 (2015) (“*CBRS Order*”); 47 C.F.R. § 96.41.