

From: Michael Marcus

To: Jose Trevino

Date: December 06, 2010

Subject: FCC file number 0525-EX-PL-2010

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Message:

Please provide the description of the operation to be conducted and its purpose in more details, including where the equipment will be placed or tested within the 50 states. Also, authorizations longer than a regular two-year license require a justification. Please justify the need for a five-year license, or would you prefer only a two-year license. Please provide a designated point-of-contact to terminate transmissions if interference occurs.

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Wireless Seismic is a designer and manufacturer of specialized equipment for the 15.247 marketplace. The equipment is wireless telemetry for geophones used in oil and gas exploration and involves equipment placed on the ground next to each geophone in arrays that often include 100s of units. The key issue in testing is that the whole network performs as intended in all terrains.

WS expects to be continually upgrading the design of its product of the next 5 years. While most 15.247 equipment, such as Wi-Fi and Bluetooth units, can reasonably be tested for performance in one or two locations, the geophone telemetry units that WS is designing must work under extreme conditions in isolated areas where oil and gas exploration is typically being done.

Thus the 5 year duration is to allow for continual product improvement and testing since a modification of the unit can not be legally tested outdoors prior to equipment authorization without a Part 5 license.

The requirement for 50 state use is to allow realistic testing in remote areas. This system uses antennas within 1m of the ground in rough terrain so testing is much more complicated than for typical 15.247 devices and must be done in remote areas.

Conversely, the nature of these remote tests also means essentially no interference risk to authorized licensed or unlicensed systems.