

**SUPPLEMENTAL STATEMENT TO EXPERIMENTAL STA APPLICATION  
FILE 0312-EX-ST-2015  
ADAPTRUM, INC.**

This application deals with use of TV White Space equipment authorized per Part 15, Subpart H in a rural area near Machias, ME at the northeast corner of the US.

In the proposed experiment, the equipment will be used at a higher height above ground than permitted under existing rules. This additional height is necessary to assure reasonable coverage in a heavily wooded area and to increase the service area of each base station transmitter. In local population density rural areas such as this, economic feasibility of providing broadband via this type of device depends critically on how many users can be served by each base station

We have previously applied for a waiver<sup>1</sup> of the current height limit to allow this experiment. Comments were requested for this in Docket 14-187 but no Commission action has been taken to date on our waiver request. We hope that timely response on this STA will allow:

- Timely broadband service to rural Americans in an area where there is both little TV coverage and few broadband options
- Proof that the existing height limit can be changed in such areas without interference to incumbent broadcasters
- Provide information that will be of value to the Commission in Docket 14-165

We believe that this will not cause interference because there are no UHF -TV transmitter anywhere near this location and the Commission's own data indicates no usable UHF TV signals in this area. This site is near the Canadian border and we have planned all antennas to point away from the border.

We will comply with all provisions of Part 15, Subpart H in the proposed experiment except the height limit. We will use an antenna height no to exceed 220 feet/ 68 m. These provisions include frequent checking the TV database for any licensed signals in the band. We will further narrow frequency selection manually beyond that allowed by the rules to minimize risk to any US or Canadian licensees.

All antennas proposed are sidemounted on existing structures that are registered with FCC and comply with FAA lighting and marking criteria. The application gives the tower registration data for the 3 sites proposed.

---

<sup>1</sup> Waiver request of Adaptrum, Inc., Docket 14-187, August 10, 2014  
(<http://apps.fcc.gov/ecfs/document/view?id=60000976684>)