

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of	)
2014 Application of Adeunis NA, Inc.	)
For Special Temporary Authority to Operate	)
Radios in the 900-901 MHz Band	)
_____	)

Declaration of Bertrand Million

I, Bertrand Million, am Vice President of Adeunis NA, Inc. ("Adeunis" or "the Company").

1. This declaration is based on the best of my knowledge, information and belief and subject to the penalties of perjury.
2. This declaration is provided in support of Adeunis' 2014 Application for Special Temporary Authority ("STA") to operate radios in the 900-901 MHz band, filed herewith.
3. I make this declaration based on the knowledge and experience I have gained as Adeunis' Vice President.
4. In my role as Vice President, I am a manager of the Company's operations in the United States of America, including sales of the Adeunis Vokkero[®] radio system that is more fully described in Exhibit A hereto.
5. The Vokkero radio system normally operates in the 902-928 MHz band on an unlicensed basis. It is used by referees and other officials at sporting events to communicate among themselves.
6. I am familiar with CoachComm, Inc. ("CC"), a manufacturer of radios (Tempest[™] radio system) that also operate in the 902-928 MHz band on an unlicensed basis. The Tempest radio systems are used by football coaching staffs to communicate internally.
7. Both CC's and Adeunis' radio systems are used in certain college football conferences' games in the same stadiums and at the same time period, such that the two systems can cause interference with each other. Sometimes, three radio systems (one for each coaching staff and one for the game officials) are operating in the same stadium, during the same time period, which, in turn, can result in additional interference.
8. Adeunis has contacted CC, on more than one occasion, in order to obtain agreement to share the 902-928 MHz band without causing interference to each company's radio systems.
9. In March 2012, the Companies signed a non-disclosure agreement and met at CC's headquarters in Auburn, Alabama. The Companies discussed several topics, but did not reach any spectrum-sharing agreement.

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10. From approximately April 2012 to May 2012, with Adeunis' permission, CC tested the Vokkero radio system. CC informed Adeunis the Tempest radio system would likely interfere with Adeunis' radios, and that Adeunis must simply accept the interference.
11. During the fall of 2012, the Southeastern Conference ("SEC") conducted trials of both the Vokkero radio system and Tempest radio system, with both systems causing and receiving interference.
12. During the summer of 2013, the SEC adopted the Vokkero radio system for use in all SEC conference football games for the 2013 Season. In order to avoid interference altogether, Adeunis obtained an STA from the Federal Communications Commission ("FCC"), File No. 0772-EX-ST-2013, Call Sign WG9XXH. Such STA expired January 1, 2014.
13. On information and belief, during August 2013, CC wrote to a number of Division 1 schools discussing the Vokkero radio system. In October 2013, Adeunis, through counsel, wrote a responsive letter to CC and again requested CC negotiate a frequency-sharing agreement with Adeunis. While CC replied to this letter, the Company did not respond to the request for negotiations.
14. From June 1, 2013 forward, Adeunis engineers have been working on a technical solution such that the Vokkero radio system could operate on the 902-928 MHz band in a football stadium without causing interference to, or receiving interference from, other unlicensed radio systems operating in the same band. This effort has made major progress, but has not yet been able to deliver the level of service quality desired by Adeunis for its customers. As such, Adeunis has not modified its radio system.
15. During 2014, Adeunis reached agreements with both the SEC and the Big Ten Conference to use the Vokkero radio system by their respective officiating squads for the 2014 football season. I expect both radio systems will receive interference, *ceteris paribus*.
16. In June 2014, Adeunis again wrote to CC, requesting negotiations aimed at reaching a frequency-sharing agreement for the 902-928 MHz band. To date, CC has not agreed to this request.

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17. I have read the attached Petition for Review, and the facts stated therein are true to the best of my knowledge, information and belief.

Signature

BERTRAND MILLON

Printed Name

VICE PRESIDENT

Title

07/09/2014

Date