

From: <PBesozzi@PattonBoggs.com>
To: K5DOM.K5PO1 (CHUIE,DYOUNG)
Date: Mon, Jun 14, 1999 7:03 PM
Subject: Supplement To Axonn Experimental STA Request (File No. 0187-EX-ST-1999)

By letter dated May 26, 1999, Axonn requested Special Temporary Authorization ("STA") to conduct certain testing of equipment in an unlicensed portion of the 218-219 MHz spectrum. In further support of its request for STA, Axonn states the following:

(1) Axonn has had approximately twenty-five (25) engineering staff working on the 218-219 MHz project. The engineering staff is at this juncture unable to move forward on development without field testing of the equipment, which field testing is dependent on grant of the STA.

(2) Axonn has limited funding for this project. If testing is delayed, future funding may be jeopardized.

(3)

Axonn is obligated by contract to complete development and testing of equipment by prescribed dates. Compliance with such contractual obligations will increasingly be jeopardized as the experimental STA is further delayed.

(4)

Axonn has arranged for space at the location specified in the STA; delay in the grant thereof will force payment additional rent on space that Axonn will be unable to use.

As noted in its original request, Axonn's tests are designed to remain within the portion of the 218-219 MHz band where there is no licensee in the New Orleans MSA. Therefore, there is no basis for any third party objections to the tests. The number of Remote Transmitting Units ("RTU") involved will be up to 20, hardly a large number. The 218-219 MHz spectrum has not been used for the last 5 years largely because of the lack of commercially available equipment. Axonn is working on solving that problem and these experiments are an integral part of that effort. Prompt grant of the STA will allow Axonn's efforts to go forward

and potentially expedite use of the 218-219 MHz spectrum.

If
you have any questions, please call me at 202-457-5292 or Janet
Fitzpatrick at
202-457-5668.

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