



CORPORATION

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November 22, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Equipment Radio Services
P.O. Box 358320
Pittsburgh, PA 15251-5130

ATTENTION: Carl Huie
Office of Engineering and Technology
Experimental Radio Branch
Request of Renewal of Special Temporary Authority

Pursuant to Section 5.56 of the Commission's Rules, (47 C.F.R. § 5.56), Axonn Corporation ("Axonn") hereby requests renewal of its Special Temporary Authority ("STA") (Call Sign WA9XFU) originally granted on June 15, 1999, in order to continue to test equipment to operate in the 218.5-219 MHz frequency band. Axonn provides the following information in support of its application, all of which is consistent with the original grant of the STA.

1. **Name/Address.** The applicant's name is Axonn Corporation, located at 101 West Robert E. Lee Boulevard, Suite 404, New Orleans, Louisiana 70124. Axonn's telephone number is (504) 282-8119.

2. **Need for Special Action.**

Axonn is a radio engineering company currently designing equipment that operates in the 218-219 MHz band for digital telemetry applications. Axonn is requesting the STA in order to speed development time and facilitate testing of the 218-219 MHz equipment by allowing operation in its local area.

There currently is no television channel 13 station operating in the New Orleans, Louisiana Metropolitan Statistical Area ("MSA").

3. **Type of Operation to be Conducted.**

Axonn plans to conduct both one-way and two-way communication. The operation will include multiple, low duty-cycle, transmit-only and transceiver devices at fixed locations throughout the New Orleans, Louisiana MSA. These devices will broadcast short data bursts to a single centrally-located base station site. The transmit-only devices and transceivers will be located at approximately ground level and will transmit with an effective radiating power ("ERP") of less than 2 Watts.

The centrally located cell transmitter station ("CTS") site antennas will be located approximately 497 feet above ground level ("AGL"). During one-way operating, the CTS will be receive-only. For two-way communication, the CTS site will transmit at an ERP of less than 20 Watts.

This operation will comply with current FCC Part 95, Subpart F Interactive Video and Data Service ("IVDS") regulations. 47C.F.R. Part 95.

4. **Purpose of the Operation.** The purpose of the operation is to test equipment designed for the 218-219 MHz band for private or commercial use. Axonn is in the process of developing equipment for potential applications which engage in one-way and two-way transmission of data in this spectrum which has largely remained unused since licenses were first granted by the FCC in 1993. Permitting this experimental use will hopefully remedy that situation by providing equipment that licensees could use to gather telemetry as a service to both business and residential customers within their license area. This telemetry data will be relayed from the CTS to a remote site via a modem and a telephone line.

5. **Time and Date of Proposed Operation.** Axonn began testing on June 15, 1999 upon grant of its initial STA. Additional testing is still necessary. Axonn requests an additional period of six months in order to complete its testing. Axonn reserves the right to request an extension of any STA in accordance with the Commission's rules.

6. **Class of Station, Call Sign of Station, and Nature of Service.** All equipment will be installed at fixed residential and commercial locations throughout the New Orleans, Louisiana MSA under the experimental call sign WA9XFU assigned to it by the FCC. Transmit-only and transceiver devices will be used to periodically send short bursts of digital telemetry information to the centrally located base station.

7. **Location of Proposed Operation.** Axonn intends to conduct tests in and around the New Orleans, Louisiana MSA. Transmit-only and transceiver devices will be placed at multiple fixed locations in the MSA, and the location of the CTS antenna is:

Latitude: 30 01 08
Longitude: 90 09 23
Street Address: Lakeway 3 Plaza, 3838 N Causeway Blvd., Metairie, Louisiana, 70002

8. **Equipment to be Used.** The antennas that will be tentatively used at the CTS site are Decibel Products (manufacturer) ASP-7A (model number) antenna (unity gain antenna, 108-512 MHz). Additional antennas that might be used are currently being evaluated.

9. **Frequencies Desired.** 218.5-219 MHz. The 218-219 MHz frequency band is allocated to the 218-219 MHz service in two separate frequency blocks: 218.0-218.5 is designated as the A-Block frequencies and 218.5-219 MHz is designated as the B-Block frequencies. The B-Block frequencies within the New Orleans, Louisiana MSA are not currently assigned to any licensee. (See FCC Public Notice, Auction of Interactive Video and Data Service (IVDS), December 4, 1996, listing license for Market 29, New Orleans, as available for auction).

Description of Equipment/Service to be Tested

Axonnn Corporation, a radio engineering company, requests renewal of its STA (Call Sign WA9XFU) in order to continue to test equipment to operate in the 218.5-219 MHz frequency band for digital telemetry applications. Axonnn's initial STA was granted on June 15, 1999, in order to speed development time and facilitate testing of the 218-219 MHz equipment by allowing operation in its local area.

Axonnn requests authority to test one-way and two-way communications during the period of their STA. The operation will include multiple, low duty-cycle, transmit-only and transceiver devices at fixed locations throughout the New Orleans, Louisiana MSA. These devices will broadcast short data bursts (30 msec. or less) to a single centrally-located base station site. The transmit-only devices and transceivers will be located at approximately ground level and will transmit with an effective radiating power ("ERP") of less than 2 Watts. The centrally located cell transmitter station ("CTS") site antennas will be located approximately 497 feet above ground level ("AGL"). The CTS site will transmit at an ERP of less than 20 Watts. All transmissions will utilize Frequency Modulation (FM) techniques and will use burst-mode transmission packets less than 20 msec in duration. This telemetry data will be relayed from the CTS to a remote site via a modem and a telephone line. This operation will comply with current FCC Part 95, Subpart F Interactive Video and Data Service ("IVDS") regulations. 47C.F.R. Part 95.

The antennas that will be tentatively used at the CTS site are Decibel Products Model ASP-7A with a unity gain antenna. Additional antennas that might be used are currently being evaluated.

All equipment will be installed at fixed residential and commercial locations throughout the New Orleans, Louisiana MSA. Axonnn intends to conduct tests in and around the New Orleans, Louisiana MSA on the 218.5-219 MHz band, where there is currently no IVDS licensee. There is no Channel 13 television station within the New Orleans, Louisiana MSA. Transmit-only and transceiver devices will be placed at multiple fixed locations in the MSA, and the location of the CTS antenna is located at Lakeway 3 Plaza, 3838 N. Causeway Blvd., Metairie, Louisiana, 70002 (Latitude: 30 01 08; Longitude: 90 09 23).

Axonnn requests the STA for an additional period of six months - until June 15, 2000. Axonnn would reserve the right to request an extension of any STA in accordance with the Commission's rules.

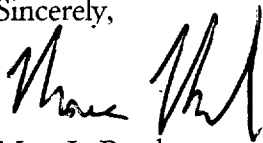
10. **Plate Power Input to Final Radio Frequency Stage.** Transmit-only and transceiver devices will radiate 2 Watts or less at the 218.5 MHz. The CTS will radiate 20 Watts or less after initial receive-only testing.

11. **Type of Emission.** All transmissions will utilize Frequency Modulation (FM) techniques and will use burst-mode transmission packets less than 20 msec in duration.

12. **Overall Height of Structure Above Ground.** The CTS antenna will be located approximately 497 feet above ground level, while the remote transmit only and transceiver devices will be at approximately ground level.

In accordance with Section 1.2002 of the Commissions Rules, Axonn certifies that it complies with the relevant provisions of the Anti-Drug Abuse Act of 1988.

Sincerely,

A handwritten signature in black ink, appearing to read "Marc L. Reed", with a stylized, flowing script.

Marc L. Reed
Software Manager
Axonn Corporation