

September 20, 2007

FILED ELECTRONICALLY

Mr. James Burtles, Chief
Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
Washington, DC. 20554

Re: BAE Systems Information and Electronic Systems Integration Inc.

Request For Special Temporary Authority - File No. 0464-EX-ST-2007

Dear Mr. Burtles:

In connection with the processing of the above-referenced application ("STA Request"), this is to advise you that BAE Systems is in the process of coordinating with our government customer (DARPA) to determine whether there is any flexibility with respect to the commencement date of the requested testing. Depending on the government's response, we may submit (under separate cover) a request for expedited processing should our customer deem it urgent to proceed no later than the currently scheduled October 15, 2007 date.

BAE Systems Network Systems (NS), a business unit of BAE Systems Information and Electronic Systems Integration Inc., a wholly-owned subsidiary of BAE Systems Inc., will conduct the testing specified in this STA Request. NS is a leader in developing, testing and building technical systems for the U.S. Department of Defense and the United States' allies in avionics, navigation, intelligence and military communications. NS's business areas include Command, Control, Computing and Intel (C3I) Systems and Communications & Tactical Networks (C&TN).

Agency-Imposed Demonstration Requirements

In connection with this STA Request, DARPA has solicited Optical Lasercom and RF CDL capability for a program called ORCA ("Optical RF Communication Adjunct"). ***In order to fully evaluate this critical warfighter capability, DARPA is requiring BAE Systems to demonstrate a Ku-Band (15 GHz) Common Data Link system running at a data rate of 274 Mbps. Demonstration of these capabilities is tied directly to a DoD user need. DARPA's current schedule specifies that initial demonstration evaluations occur in October 2007. In order to keep the source selection schedule intact, it is***

Mr. James Burtle, Chief
Experimental Licensing Branch
Office of Engineering and Technology
Page 2

respectfully requested that this STA Request receive due consideration in order to ensure that the first round demonstration can occur by the testing schedule mandated by DARPA. In addition, the full range of tests for which authority is requested are anticipated to occur within a six month period from grant. In light of the above, grant of this STA Request by October 15, 2007 (or a later date specified by DARPA) is appropriate.

The relevant contract/program information is as follows:

Agency/Customer:	DARPA
Contract/Solicitation No.:	BAA 07-55
DARPA Contact Person:	Larry Stotts
	Larry.stotts@darpa.mil
	(571) 218-4346

Additional Factors and Mitigation of Interference

As explained above, the need to commence operations by October 15, 2007 (or later date specified by DARPA), is directly tied to a DoD user need and is based on a DARPA-imposed demonstration schedule. Additional factors supporting expedited grant in this case are as follows:

A. Very Limited Frequency Request

This STA Request seeks authority to operate on only two frequencies, namely 14.615 GHz and 15.245 GHz. Although BAE Systems understands that NTIA coordination will be necessary for this STA Request, the limited selection of frequencies should help reduce the burden of coordination on an expedited basis.

B. Highly Directional Antennas

The experimental antennas being used for this experiment are highly directional, thereby minimizing potential for interference. Specifically, the half power beamwidth is 3°, and the polarization is Right Hand Circular Polarization (RHCP). The directional antennas will lock on its targets during transmission rather than rotating during transmission.

C. Non-Continuous Operations

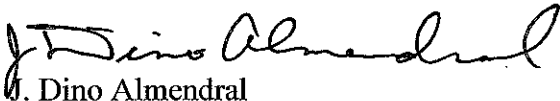
Operation of the requested Facilities will not be continuous. Rather, authority for only limited and sporadic operation of the Facilities is requested during the authorized timeframe, i.e., at any given authorized location, the cumulative period of operation in any given 24 hour period will be no more than 8 hours. In the off state, no measurable power will be radiated.

Mr. James Burtle, Chief
Experimental Licensing Branch
Office of Engineering and Technology
Page 3

Based on the above, processing and grant of the above-referenced STA Request by October 15, 2007 (or later date specified by DARPA) is respectfully requested.

Please let me know if you have any questions.

Respectfully submitted,



J. Dino Almendral
Legal Counsel
BAE Systems Network Systems