

From: Rummel, Jeffrey [Rummel.Jeffrey@ARENTFOX.COM]
Sent: Tuesday, January 18, 2005 3:14 PM
To: John Kennedy; Douglas Young
Cc: Johnson, Tracy H (US SSA)
Subject: Experimental STA Request - BAE Systems - File No.
0693-EX-ST-2004

Mr. Kennedy and Mr. Young:

This is to advise you that I just submitted via the ELS, on behalf of my client BAE SYSTEMS Information and Electronic Systems Integration Inc., my client's response to Mr. Kennedy's correspondence dated January 14, 2005 under Ref. No. 3369. The response was submitted through the appropriate ELS "Reply To Correspondence" link. The text of the response is re-printed below, for your convenience and easy reference.

I wanted to alert you to the submission of BAE SYSTEMS' response so that the information can be conveyed as soon as possible back to the entity which originated the questions.

BAE SYSTEMS had requested a grant of these facilities for a January 17, 2005 commencement date, based on the requirements associated with these anticipated operations. Accordingly, resolution of these remaining outstanding issues as soon as possible would be greatly appreciated.

Best regards,

Jeffrey Rummel

Mr. Kennedy:

On behalf of BAE SYSTEMS Information and Electronic Systems Integration Inc., I am forwarding to you the following information provided by the applicant in response to your above-referenced inquiry:

1. As an initial matter, BAE SYSTEMS appreciates the Commission's concerns regarding the potential for interference that may exist with respect to this, or any, application for experimental facilities. To that end, consistent with its approach with respect to all transmissions on Commission-regulated spectrum, BAE SYSTEMS hereby confirms its commitment to minimize the risk of interference to any and all co-channel or adjacent licensees. As evidence of such commitment, BAE SYSTEMS has reviewed its frequency requests in the above-referenced application and has determined that it would be willing to have the Commission issue a very narrow grant on only six (6) discrete frequencies in order to reduce the potential for interference to as many licensees as possible. The six frequencies BAE SYSTEMS has identified as acceptable for grant as replacements of the frequencies bands previously identified in the application are as follows:

900 MHz
1400 MHz
1900 MHz

2100 MHz
3500 MHz
4000 MHz

BAE SYSTEMS notes that its anticipated experiment will not involve the use of swept carrier. Rather, the experiment will involve the transmission on the above discrete frequencies (with a tolerance of ± 10 KHz absolute frequency accuracy) in a "step" fashion. Specifically, transmissions will dwell at a single particular frequency for 10 to 15 minutes, after which transmissions will discretely step (or change frequency) to the next frequency in the above list. BAE SYSTEMS anticipates that it will typically transmit for only 10 to 15 minutes while on any given frequency. Cumulative transmission times are anticipated to be quite limited. In fact, to reiterate the commitment made by BAE SYSTEMS in its application, the cumulative period of operation in any given 24 hour period will be no more than 2 hours.

Should the Commission determine that grant on the above six discrete frequencies is preferable, BAE SYSTEMS would not object to the Commission amending the application internally to reflect the replacement of the previously requested frequency bands with the above-referenced discrete frequencies.

2. As explained in the above-referenced application, operation of the requested facilities will be conducted outdoors. As such, there will be no physical shielding of the transmissions. However, the directional nature of the anticipated transmissions and the geography of the surrounding area demonstrate a minimal risk of interference to co-channel users. Specifically, the transmissions will emanate from a stationary transmitter located on BAE SYSTEMS' secure campus, and will be pointed straight to the receive antenna with a 0° horizon angle. Such transmissions do not point towards any adjacent congested population. The exact location and pointing vector were provided in the original submission.

3. As further evidence of BAE SYSTEMS' commitment to reduce the potential for interference, BAE SYSTEMS confirms its representation in the application that it would not object to the Commission imposing restrictions on the time(s) of day during which the authorized transmissions may occur, as long as the applicant is permitted to meet the minimum transmission duration requirements specified at Item 1 above (i.e, transmissions to dwell at any given frequency for 10 to 15 minutes, and the cumulative period of operation in any given 24 hour period will be no more than 2 hours).

4. Finally, the following additional information is provided:

A. As set forth in the application, BAE SYSTEMS has identified dedicated personnel to immediately address any interference concerns that may arise. Specifically, as explained in the application, BAE SYSTEMS' Brian Egan will be personally conducting the test and will be available by wireless telephone at (603) 566-4879. Mr. Egan will act as a "stop buzzer" if any issues regarding interference arise during testing.

B. STA has been requested for only a five month period, and BAE SYSTEMS does not anticipate a need to request additional authority for the operations specified in this application.

C. There will be no intentional modulation. The signals are to be considered pure Continuous Wave (CW). The only possible unintentional

modulation would be the residual FM inherent from the synthesizer's phase noise. Hewlett Packard specifies the phase noise to be < 86 dBc at 10 KHz.

BAE SYSTEMS trusts that the above information satisfactorily addresses any concerns the Commission may have with respect to the potential for interference associated with the facilities requested in this application. If, however, any significant additional questions remain, BAE SYSTEMS respectfully requests that it be given an opportunity to address such questions prior to the Commission taking action on the application.

Respectfully submitted,

Jeffrey Rummel, Esquire

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and Electronic Systems Integration Inc.

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