

From: Christopher Imlay

To: Behnam Ghaffari

Date: October 14, 2018

Subject: 1576-EX-ST-2018

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Message:

I am sending this in response to correspondence relative to this STA application which is still shown as pending as of today (10-14-2018). The event to be served by this STA, the annual Formula One Race in Austin, Texas is scheduled to start October 18.

The application covers VHF and UHF channels for use in support of this race. Two other applications for STA have been granted already, addressing microwave channels needed.

The correspondence (43999) indicated that there were four consents called for in order to permit grant of this application without deletion of certain VHF bands. Two frequency ranges are not going to be used, so consents from Spire Global, Inc. and Planet Labs, Inc. were not requested. I responded to the correspondence and noted that fact.

That left two consents required. The first was a request to Orbcomm License Corp, needed in order to use the band 161-163 MHz. I contacted Mr. Walter Sonnenfeldt by e-mail and asked for consent but received no response whatsoever.

The second consent was from Iridium Constellation LLC. I contacted Maureen McLaughlin there and I heard back from Iridium's communications counsel, Joseph Godles, who informed me that Iridium held no VHF licenses and believed that there was a mistake in this condition, and that the band subject to their consent, 156.0125 - 162.0375 MHz was "off by a factor of ten" from any frequencies in which they had an interest.

I am wondering if the Orbcomm and Iridium consent requirements were imposed in error based on a misunderstanding of the spectrum requested? Satellite companies are not likely to be using these frequency ranges and Iridium has indicated affirmatively that in fact they don't.

Furthermore, in the past six years that I have been requesting STAs in these ranges for this exact same event at the same location, no such conditions have ever been imposed. Nor has there ever been any interference complaint reported during or after any prior race event using these bands. There will be on-site, real time frequency coordination and interference resolution experts at the race events for the entire period and we will be happy to accept strict non-interference obligations in the bands at issue.

I would ask that these consent requirements be reviewed and that this application be granted to facilitate this important international automobile race.

Thank you.

Best, Chris Imlay

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