

CITY OF OAK RIDGE



Oak Ridge Police Department
Telephone: (865) 425-3504
FAX: (865) 425-3607
Email: orpd@corn.org

POST OFFICE BOX 1 • OAK RIDGE, TENNESSEE 37831-0001

May 13, 2013

Julius Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

**RE: Experimental License Service Application,
File No. 0853-EX-ST-2012
Amended Statement**

Dear Mr. Knapp,

The City of Oak Ridge, TN seeks approval of it's the above-referenced application for Experimental Special Temporary Authority (STA) to operate in the 700 MHz public safety broadband spectrum to demonstrate and test Long Term Evolution (LTE) equipment for a period of 180 days commencing with the grant of the application. The proposed operation will be conducted in the 758-768/788-798 MHz spectrum that is licensed to the First Responder Network Authority ("FirstNet").

The purpose of the proposed operation is to provide the City of Oak Ridge and other local, state and Federal officials that cooperate in the area an opportunity to test and receive an introductory knowledge of the potential benefits and capabilities of an LTE public safety network. The Oak Ridge, Tennessee area accommodates a significant nuclear weapons stockpile. The City, along with state and Federal officials already cooperate to ensure safety and security of the area, and protect the public. Testing and demonstration of the LTE system as proposed will provide preliminary information essential to the planning of future communications and interoperability in the Oak Ridge area. Furthermore, the demonstration and testing also has the potential to support and promote the benefits of the planned nationwide public safety broadband network which FirstNet has the responsibility to deploy.

As addressed in the narrative statement to this application, the proposed test can provide the parties involved and FirstNet with valuable preliminary information on ways in which governmental entities can cooperate together in using a broadband network. The City of Oak Ridge also intends to pursue early deployment lease negotiations with FirstNet during the 180 day testing period. The City of Oak Ridge believes the preliminary information will be especially helpful and that the STA testing, followed by a subsequent lease, if approved, would provide "lessons learned about government cooperation and broadband applications that will be invaluable to FirstNet.

The above-referenced application for Experimental STA was submitted October 25, 2012 and remains pending because a process to seek consent from FirstNet was



only recently established. Oak Ridge submits this amended letter as part of the above-referenced application to affirm its understanding of the primary status of FirstNet as the licensee, seek FirstNet's consent and provide our commitment to conduct operations under this requested STA as follows:

- 1) Operation will be confined to the immediate vicinity of Oak Ridge, Tennessee. The equipment will include three temporary base stations and associated antennae, and a small number of portable units all operating within 2 miles (3.22 kilometers) of the base sites.
- 2) The testing and demonstrations will be conducted on the 758-768/788-798 MHz bands, which are currently licensed on a nationwide basis to FirstNet.
- 3) Operation will occur for up to 180 days from the date on which the FCC grants the City of Oak Ridge an Experimental STA, allowing time during that period for setup and testing, demonstrations and teardown.
- 4) The City has analyzed information from the FCC's license databases and determined that the proposed operation would not interfere or create a significant potential for interference with any public safety operations in the 700 MHz band.

Furthermore, the City of Oak Ridge acknowledges the following limitations that will be applicable to grant and use of this STA as conditions to obtain consent from FirstNet:

- 1) The temporary experimental operation is not intended for the provision of regular public safety mission-critical communications or the delivery of live transmissions in duties to protect life, property or safety. The Experimental STA will provide the City of Oak Ridge and other interested parties with an opportunity to test and receive an introductory knowledge of the potential benefits and capabilities of an LTE public safety network.
- 2) The City of Oak Ridge intends to pursue lease negotiations with FirstNet. In the event these lease negotiations cannot be concluded within the 180 day term of this requested STA, the City of Oak Ridge recognizes that continued use of the frequencies licensed to FirstNet requires that a separate application for such use be submitted and a separate concurrence from FirstNet must be obtained.
- 3) Oak Ridge recognizes that its experimental operations will be secondary and must not cause interference to any operations authorized on a primary basis in this spectrum licensed to FirstNet. Further, the City understands that any such primary operations have no obligation to mitigate any interference that might be present to

CITY OF OAK RIDGE



POST OFFICE BOX 1 • OAK RIDGE, TENNESSEE 37831-0001

the Oak Ridge experimental operations.

- 4) The City of Oak Ridge acknowledges that although FirstNet has not yet deployed in the geographic area covered by the application, if, during the term of this STA, FirstNet or its assignees or lessees plans to deploy in the area, Oak Ridge may need to reduce the coverage or power of its experimental transmissions or cease them entirely to prevent interference to those operations.
- 5) The undersigned serves as an overall project manager for these experiments. In addition, in the unlikely event interference did occur from the proposed operation, the undersigned also serves as a "stop-buzzer" contact.

The City of Oak Ridge appreciates your consideration in this matter and requests that both the FCC and FirstNet act as expeditiously as possible so the requested Experimental STA can be granted without further delay. The City is anxious to test and demonstrate the benefits broadband LTE technology can bring to public safety agencies in our area.

Regards,

A handwritten signature in dark ink, appearing to read 'Alan Massengill', is written over the typed name.

Alan Massengill
Deputy Chief of Police
City of Oak Ridge
200 S. Tulane Ave
Oak Ridge, TN 37830
amassengill@cortn.org
Telephone: (865) 425-3508

cc: Regina Harrison, NTIA
RHarrison@ntia.doc.gov