

**Comtech Systems, Inc.  
Experimental STA Extension Request  
Call Sign WR9XCI  
File No. 0675-EX-ST-2021**

**EXHIBIT 1 – REQUEST FOR EXTENSION OF EXPERIMENTAL STA**

Comtech Systems, Inc. ("Comtech") hereby requests a modification to the FCC experimental Special Temporary Authority extension ("STA") granted by the Commission on April 22, 2021 under FCC Call Sign WR9XCI.<sup>1</sup> That STA extension authorized Comtech to continue utilizing select X Band frequencies for testing and development of a Next Generation Troposcatter system within a 241 km radius of its facility located in Orlando, FL. That request also authorized the emission designator of 14M0G1D.

This request only seeks to increase the authorized radius from 241 kilometers to 425 kilometers to expand suitable test locations and to change the authorized emission designator from 14M0G1D to 25M0G1D. No other changes are proposed.

As noted in the prior requests, Comtech is developing the Next Generation Troposcatter (NGT)<sup>2</sup> system for the US Marine Corps. pursuant to Contract Number M67854-19-R-2000. The experimental STA is required to test the system for short periods of time as required utilizing the X Band frequency ranges of 7200 MHz, 7300 MHz, 7600 MHz, and 7700 MHz for the testing.

Comtech will continue to adhere to all special conditions as listed on the STA extension grant, namely-

***Special Conditions:***

- (1) In lieu of frequency tolerance, the occupied bandwidth of the emission shall not extend beyond the band limits set forth above.***
- (2) The station identification requirements of Section 5.115 of the Commission's Rules are waived.***
- (3) Licensee should be aware that other stations may be licensed on these frequencies and if any interference occurs, the licensee of this authorization will be subject to immediate shut down.***
- (4) The stop buzzer contact for this project is Paul Kelly at Comtech, mobile: (321)948-4315, e-mail: paul.kelly@comtechsystems.com the US Marine Corps. Pursuant to Contract Number M67854-19-R-2000***
- (5) Comtech Systems, Inc. must schedule and provide notification with EAFC by phone at 321-853-8426 or email 45sw.dodeafc@us.af.mil prior to testing of experimental use in the requested bands.***
- (6) This authorization is issued for the express purpose of conducting experimental operations described in the related application and required by US Marine Corps., Contract Number M67854-19-R-2000. The use of this radio station in any other manner or for any other purpose will constitute a violation of the privileges herein authorized. Except as subsequently authorized by the Commission, this radio station shall not be operated after the expiration date of the contract designated in the related application and enumerated above.***

Because the equipment is technically incapable of providing station identification, Comtech respectfully requests a waiver of the station identification provisions of Section 5.115 of the Commission's rules, 47 C.F.R. § 5.115.

The stop buzzer contact continues to be Paul Kelly at Comtech, mobile: (321) 948-4315, e-mail: [paul.kelly@comtechsystems.com](mailto:paul.kelly@comtechsystems.com)

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<sup>1</sup> File #0549-EX-ST-2021, STA extension grant April 22, 2021

<sup>2</sup> In conjunction with Cubic/GATR

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Comtech submits that a grant of this request is necessary and in the public interest because it will allow Comtech to support expanded testing and development of the NGT system to be used by the US Marine Corp. and support its order with the United States Marine Corp., thus advancing national security efforts.