

COMTECH SYSTEMS, INC.
EXPERIMENTAL STA APPLICATION
CALL SIGN: WE9XID
FILE NO. 0467-EX-ST-2010
SEPTEMBER 2010

REQUEST FOR SPECIAL TEMPORARY AUTHORITY
& REQUEST FOR EXPEDITED PROCESSING

Consolidated Response to Questions 4 and 5.

Comtech Systems, Inc. ("Comtech") hereby requests Special Temporary Authority ("STA")¹ to conduct additional experimental testing of its Transportable Fast Link Antenna ("TFLA"). The testing proposed herein is required to demonstrate to the United States Marine Corp. that the TFLA system meets the technical specifications as contained within its contract with the US Marine Corp. The experimental testing would occur between **October 20, 2010 through April 20, 2011**, at locations in Orlando, Florida, Huntsville, Alabama, and Silver Springs, Nevada. Given, the short timeframe to begin this testing, Comtech is hereby requesting expedited processing of this STA request so that the TFLA units can be finalized for production for its order with the United States Marine Corp.

As noted in the previous STA requests, Comtech will utilize three frequencies in the range of 4.4 – 4.94 GHz (low, middle, high) on an intermittent basis to conduct this testing. Only one frequency would be utilized at any given time during the testing.

Given the extremely low transmitting power level, Comtech believes that no harmful interference to any FCC licensees will occur. However, to the extent necessary Comtech will use its best efforts to avoid and minimize any potential interference. Comtech further recognizes that if any interference to existing licensed stations occurs, any testing will be subject to immediate shut down. 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.

All network traffic will be simulated traffic only, solely for evaluation purposes and not for the purpose of providing network data communications services to user stations.

Comtech submits that a grant of an experimental STA is necessary and in the public interest because it will allow Comtech to finalize its order with, and allow deployment by, the United States Marine Corp., thus advancing national security efforts.

The **stop buzzer contact** for this project is Paul Kelly at Comtech, tel: (407) 854-1950 ext. 3050, mobile: (321) 948-4315, e-mail: paul.kelly@comtechsystems.com

¹ On March 29, 2010 Comtech filed an experimental Special Temporary Authority request (**File No. 0163-EX-ST-2010**) to conduct experimental testing of its Transportable Fast Link Antenna ("TFLA") in order to measure the receive characteristics of its antenna unit currently in development. This request was approved by the Commission on April 1, 2010 under call sign **WE9XID** and expired April 20, 2010. On May 6, 2010 Comtech filed for an extension of this STA (**File No. 0236-EX-ST-2010**) to further test the antenna feed and receive characteristics of its TFLA. This request was approved by the Commission on May 17, 2010 and expired June 18, 2010.

Request for Expedited Processing

Comtech hereby requests that the above-captioned application be processed on an expedited basis because the TFLA equipment subject to the testing requested herein has been ordered by the United States Marine Corp and will be ultimately be deployed to troops in Afghanistan. As previously noted, the testing referenced herein is necessary to demonstrate that the TFLA units meet the technical requirements and specifications of the United States Marine Corp. Upon final testing and verification, the final TFLA units will go into production for this order, so that the United States Marine Corp can deploy these units in Afghanistan.

Expedited processing of the Comtech application is therefore a matter of serious national security and will advance the declared war on terror. Failure to process the application on an expedited basis would disserve the public interest by delaying the testing and deployment of powerful new communications equipment to the United States military. For all of these reasons, Comtech respectfully requests expedited processing of the application, and a decision concerning the application as soon as possible.

Transportable Fast Link Antenna

