

**COMTECH SYSTEMS, INC.  
EXPERIMENTAL STA APPLICATION  
CALL SIGN: WE9XID  
FILE NO. 0572-EX-ST-2010  
DECEMBER 2010**

**REQUEST FOR SPECIAL TEMPORARY AUTHORITY  
& REQUEST FOR EXPEDITED PROCESSING**

**Consolidated Response to Questions 4 and 5.**

Comtech Systems, Inc. ("Comtech") hereby requests short term Special Temporary Authority ("STA") between **December 15, 2010** to **December 17, 2010** to conduct experimental testing of its Transportable Fast Link Antenna ("TFLA") at its facility located in Orlando, Florida. The short term testing proposed herein is contractually required under its TFLA contract with the United States Marine Corp.

**Background**

On September 22, 2010 Comtech filed an experimental STA request under File No. 0467-EX-ST-2010, seeking authority to conduct experimental testing of its TFLA system to demonstrate the system meets the technical specifications as contained within its contract with the US Marine Corp. That request was granted by the Commission for the period of October 20, 2010 through April 21, 2011, and authorized testing at locations in Orlando, Florida, Huntsville, Alabama, and Silver Springs, Nevada. The frequencies authorized by the Commission were 4400 MHz, 4700 MHz, and 4935 MHz with an output power of 20 mW and an ERP of 2.0 Watts. Comtech will continue to utilize this STA through the ending term.

As noted above, Comtech requires short term STA so that it can conduct additional experimental testing of the TFLA system at its Orlando facility to comply with contractual requirements for its customer, the United States Marine Corp. As referenced in previous STA filings for related TFLA testing<sup>1</sup>, these units will be ultimately be deployed by the United States Marine Corp to troops in Afghanistan.

The current testing proposed herein mirrors that as previously granted by the Commission under File No. 0467-EX-ST-2010, with the exception of a higher requested power level. Also, authority is not currently sought for testing at the Huntsville, Alabama and Silver Springs, Nevada locations<sup>2</sup> as authorized under that STA.

Comtech proposes to conduct the experimental testing with an output power of 2000 Watts (W) and a transmitting ERP of 20.0 Megawatts (MW). The required testing will not go beyond a twenty-four hour period. The date range of December 15, 2010 to December 17, 2010 is sought to allow test development/planning. Comtech has selected the frequencies previously authorized by the Commission, namely 4400 MHz, 4700

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<sup>1</sup> See FCC File Nos. 0163-EX-ST-2010, 0236-EX-ST-2010, and 0467-EX-ST-2010

<sup>2</sup> In the future Comtech will require similar short term Special Temporary Authority for testing at these locations and will seek Commission authorization for such testing when more accurate timelines materialize.

MHz, and 4935 MHz to conduct this testing. Comtech will only require and utilize one of these three frequencies to conduct the short term testing and hereby requests that the Commission allocate one of these three frequencies on any Special Temporary Authorization.

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.

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