

This exhibit updates the prior submission based on request by the FCC.

This update:

- 1) Substantially lowers the ERP for all nodes,
- 2) Changes the frequency band requested to eliminate operations below 2417 MHz, and
- 3) Limits timeframe of operations in any one geographical area to four weeks to address FCC concerns regarding contiguous U.S. operations.

25 Feb 2002 - Tim Krout

Exhibit #1 to FCC Form 422 for CenGen Communications Experimental Efforts.

Consulting & Engineering Next Generation Networks (CenGen) Inc. is engaged in several government sponsored (e.g. Office of Naval Research (ONR), Defense Advanced Research Projects Agency (DARPA), etc.) and Internal Research and Development (IRAD) efforts to advance wireless communications. Objectives under investigation by CenGen Inc. include:

- 1) advances to support highly mobile users of wireless connectivity,
- 2) advanced usage of spectrum to improve spectral efficiency,
- 3) use of all layers of the protocol stack to improve efficiency and mobile user connectivity, and
- 4) advances in electronic scanned arrays (ESA, phased arrays, etc.) in particular to improve spectral reuse through directional antenna approaches.

CenGen Inc. has and anticipates contracts as well as IRAD funding to support data collection and measurement activities to substantiate, augment, and support modeling and simulation efforts and laboratory type efforts typically undertaken by the Original Equipment Manufacturer (OEM) of particular components of RF technology (i.e. Radios, transceivers, modems, antenna, ESA, protocol stacks, applications, etc.). Due to the commercial aspects, success, and the relative ease in acquiring 2.4GHz components, this frequency band is often utilized by the OEM for development of hardware. The ability to conduct testing which includes this frequency band as a component of the testing is very important to the advancement of the objectives stated previously. Testing at any particular location or experiment site is typically a few weeks in duration; however locations change frequently to accommodate a variety of environmental, terrain, propagation, and experimental objectives.

The research and experimentation efforts support data collection in field environments. Advances in modulation techniques to counter multipath, jamming, and interference are being addressed as components of ongoing DARPA sponsored efforts. Advanced ESA to improve spectral efficiency via the use of directional antennas are being developed. Physical layer advances (i.e. modulation techniques and directional antennas) require advances in high layer protocols to enable effective network communication. Recent efforts have indicated that the use of higher layers to form networks consisting of

directional antennas may enable significant spectral reuse. A simple example would be a three node network where the middle node can seamlessly relay for nodes on either side of it, allowing all nodes to transmit at lower power than if the end nodes would attempt to communicate directly (i.e. without the relay in the middle). The result of the lower power transmission could result in the frequency being available for reuse by other nodes at shorter distances than are in standard use today. Another example relevant to the FCC would be the more effective use of spectrum by enabling effective use of highly directional antennas to mitigate interference and/or increase range, potentially allowing spectral reuse to a significantly higher degree than is presently implemented. The impact of such a configuration is that higher layer protocols need to be advanced along with the physical layer changes and the impact on the applications (i.e. likely longer latency in the simple example above) need to be addressed, including advances to make the applications more tolerant to mobile wireless networks. If approval, this request will advance physical layer (e.g. radios, ESA), media access control layer, network layer, and application layer efforts presently being address in isolation by enabling them to be tested in a variety of field environments.

The exact equipment in use for field-testing varies from test to tests. In all cases, power amplifiers of less than or equal to 6 watts peak power and antenna with 20dBi or less gain will be used on ground nodes and 6watts peak power and antenna with 20dBi or less gain will be used on all airborne nodes. All work in this frequency band will be between 2.418 GHz and 2.473 GHz. Orinoco (a.k.a Wavelan) is a common test radio platform and is often used as a radio with a replacement MAC layer. Commercial off the shelf antennas are proposed for many tests, in all cases with less than or equal to 20dBi of gain for ground nodes and 20dBi or less gain for airborne nodes. Other radios and antennas are being developed under DARPA funding by OEMs and will be used during the conduct of testing. In all cases peak effective radiated power (ERP) will be less than or equal to 27.8dBw (7.8dBw peak for power amplifies + 20dB max. antenna gain) for all ground nodes and less than or equal to 27.8dBw (7.8dBw pear for power amplifiers + 20dBi max antenna gain) for all airborne nodes.

CenGen Inc. requests permission to use power amplifiers, directional antennas, fixed ground, mobile ground, and mobile airborne assets in the conduct of experimental efforts to address the above objectives. Power amplifiers up to 6 watts peak power for ground use and 6 watts peak power for airborne use are desired to support testing in locations where propagation is difficult due to foliage or comparable line-of-sight limitations. Directional antenna, including advanced electronically scanned arrays, with beam width of 5 degrees or greater, effectively 20dBi gain or less are planned for ground use and 20dBi gain or less for airborne use and permission for their use requested. All ground antenna placements will be below 6 meters in height or attached to pre-existing structures so no adverse impact to aviation is possible. Airborne nodes, comparable to those pictured in picture 1, will be used to support air-to-air and air-to-ground testing. Aircraft, including those pictured, have been supporting Government, OEM, or related efforts in this frequency band. Airworthiness and related issues have been and will continue to be addressed with the FAA.

Permission is requested to use the above components in testing throughout the contiguous United States (all states except Hawaii and Alaska). Testing is planned to continue through July 2003 and permission is requested for this duration.

Timeframe

CenGen understands FCC concerns about granting this request for contiguous United States operation. However the nature of the experimental efforts are such that experiments are typically conducted for short durations, typically one to four weeks, often in multiple geographical regions concurrently. To mitigate this concern CenGen will only utilize this license for short term operations lasting four weeks or less in any one geographical area. If CenGen is to engage in any experimental effort in any one geographical area lasting longer than four weeks a separate license will be requested to support that experimental effort, even if the radio frequency and related technical information is covered by this license.



Photo 1. Aircraft used for air-to-air and air-to-ground testing.