Exhibit A

File Number: 0266-EX-CN-2019

Exhibit A – Narrative and Justification

Pursuant to Section 5.63(c)(1) of the Federal Communications Commission's (FCC) rules, Contour Networks Inc. (CNI) provides this exhibit in support of its application for a license to conduct a Market Trial, as defined under sections 5.5 and 5.602. The requested Market Trial will take place in Arapahoe County, Colorado and will consists of experiments to advance the radio art with respect to the Citizens Broadband Radio Service (3550MHz-3700MHz). CNI respectfully requests to be granted a license to conduct a Market Trial using 3550MHz-3700MHz spectrum for a period of 12 months from the award date, which is requested to be on or before May 20, 2019.

Description of the Trial

CNI requests permission to conduct a Market Trial in Arapahoe County, Colorado. The trial will take place at an outdoor shopping mall in the Aurora City area (Southlands Mall). CNI is partnering with the network and Internet Service Provider (ISP) for the mall, a Competitive Local Exchange Carrier (CLEC). CNI will deploy a wireless CBRS network for use in multiple applications including network redundancy, the deployment of pop-up kiosk stores, and IoT applications like secure, private connectivity for retail Point-of-Sale (POS) applications, security cameras, sensors and HVAC systems. Our partner is the network and Internet Service provider at malls nationwide and is working with CNI in evaluating the possibility of deploying CBRS networks nationally.

With respect to incumbent services, CNI will take appropriate steps to ensure interference protection. We will work closely with our spectrum allocation service (SAS) provider, Federated Wireless, to ensure that our base station does not cause interference with any incumbents operating in 3650MHz-3700MHz spectrum. As our trial is in Colorado, it is many hundreds of miles from coastal regions where higher priority radar communications occur. We will also ensure that we have the capability to terminate communication from the base station (a so-called "kill switch") 24/7.

CNI's trial will involve communications between a small cell transmitter and consumer smartphones and similar low power devices that support the requested spectrum, as well as communication between externally and internally mounted CPE transmitters and the small cell base station. The underlying technology to be employed in the trial is the Frequency Division Duplex Long Term Evolution (FDD-LTE) transmission standard. CNI

will retain ownership of all transmitting and/or receiving equipment and will notify all end-users that devices will be rendered inoperable or retrieved at the conclusion of the Market Trial as required by Section 5.602(e). CNI agrees to notify all end users in the Market Trial that the service they will be receiving is being provided in part or in whole under experimental authority. Upon expiration of the trial, CNI will either (a) cease operations in 3550MHz-3700MHz if no other regulatory mechanism allowing use of same is in force, (b) transition to Initial Commercial Deployment licensing status if CNI is authorized to do so or (c) transition to General Authorized Access (GAA) under Part 96 and will ensure that all equipment used is certified and authorized under GAA licensing rules.

Purpose of the Market Trial

The Market Trial is necessary to enable CNI to learn a significant amount of information regarding the provision of service in the CBRS band, including customer acceptance of quality of service for various applications at various speeds and price points. Specifically, CNI will be testing and validating the following:

- Technology validation, in particular the signal characteristics and coverage from a single small cell base station in a defined area operating at the higher power outputs/ERP authorized under CBRS
- Business use cases and pricing models for the aforementioned technology applications
- Evaluate the ability of the equipment to meet the needs of a dense network of connected devices
- Validation of data security and transport reliability on a private CBRS network
- Validation of the viability of CBRS as a redundant network for enterprise grade connectivity
- Engage in collaborative troubleshooting with our SAS provider

CNI will use the Market Trial to validate the overall performance of the services we will provide to our customer and to future customers using the CBRS band, including throughput speeds, jitter, delay, signal quality at various distances, the number of devices that can theoretically connect while maintaining quality of service and more. We will be evaluating these and the above across multiple applications and seeking to determine the optimal service pricing building on factors such as various quality of service and throughput levels, timing of connections, number of connected devices, public vs private networks and more. A further key business evaluation will be the impact of quality of service levels and price points on service adoption rates.

Criteria for Success of the Market Trial

A successful Market Trial will provide CNI with data that will enable it to understand the potential for success in a commercial deployment of the CBRS band in a high-density retail environment. This will include likely customer adoption rates for various services at various price points, service levels and throughput. Additionally, CNI will be seeking to evaluate and confirm the performance of CBRS equipment in terms of signal propagation and coverage, signal characteristics in strong and weak signal areas, device performance including latency, jitter, delay and more in strong and weak signal areas as well as application performance in strong and weak signal areas and with various throughput and quality of service levels. A key objective will be to utilize the business and technical information garnered through this Market Trial to ascertain the financial and technical viability of CBRS service offerings across multiple verticals.

Number of Devices Necessary to Meet Market Trial Objective

CNI has applied to conduct the Market Trial using one small cell base station and multiple (approximately 15) Band 42, 43 and Band 48 End User Devices operating at less than 23 dBm (such as the Essential phone smartphone).

Contour Networks Inc. respectfully requests that the Federal Communications Commission expeditiously grant the requested experimental license to conduct a Market Trial.