

0278-EX-ST-2021 Correspondence

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Please provide the following additional information:

1. Explanation of how it would coordinate any usage with a Spectrum Access System (SAS).

Cosworth's site locations have been given to the OET experimental licensing system. These site locations have been given to Google SAS. The SAS system should direct any CBRS devices away from the specified frequencies of Cosworth's system so that CBRS devices do not receive any interference. If the SAS is unable to do so, Cosworth acknowledges it cannot cause interference to any CBRS device and must be shut down if interference is inevitable.

2. Explanation of how it would specifically avoid causing interference to incumbent and commercial operations in the band, including General Authorized Access (GAA).

From the FCC's website and Part 96 of the rules, the Priority users in CBRS operate from 3600 – 3650 MHz. Cosworth's Live-on-Air system operates from 3655 – 3695 MHz, and therefore should not cause any interference for Priority users.

For GAA users, it was explained that Cosworth will notify the SAS provider (in this case Google SAS) of Cosworth's base station sites. These site locations can aid in the SAS servers moving CBRS devices away from Cosworth if interference is detected. In the event the frequency space is saturated and devices cannot be moved, Cosworth understands and acknowledges it cannot cause interference to any CBRS device and must be shut down if interference is inevitable.

For Incumbent users, Cosworth's system is not powerful enough to transmit more than 1 km and therefore should not interfere with any Naval activities. However, Cosworth understands and acknowledges it cannot cause interference to any CBRS device and must be shut down if interference is inevitable.