

Covad Communications Group, Inc.
FCC Form 405
Application for Renewal of Experimental License

Narrative Statement

The attached application seeks renewal of the authority to operate experimental stations WD2XUN. Since obtaining the license for experimental station WD2XUN Covad Communications Group, Inc. ("Covad") has: (1) actively evaluated the Commission's regulations regarding the 3.65 GHz band; (2) advocated amendment of the regulations in the band to facilitate the unlicensed use of the spectrum while, at the same time, ensuring efficient and interference-free business-class use the spectrum; and (3) monitored the availability of 3.65 GHz WIMAX equipment from suppliers. Covad's ability to utilize the experimental license for testing was hampered over the past two years in large part due to the lack of contention-based equipment until very recently and the fact that 3.65 GHz service rules were in a state of flux. Now that the regulatory landscape is more settled and equipment is becoming available, Covad will be able to pursue testing more aggressively.

Assuming the availability of 3.65 GHz WIMAX equipment in Q1 2008, Covad will determine which markets to deploy technical trials. In those markets where it will conduct trials, it intends to take some of the following actions: (1) identify relevant satellite operator(s) with a downlink in the test areas and initiate dialogues with them; (2) test the equipment; and (3) determine how the Commission's service rules permit Covad to reasonably and effectively use this spectrum in its existing markets.