DESCRIPTION OF EXPORT-ONLY DEVICE TESTING AND PUBLIC INTEREST STATEMENT

This application seeks Federal Communications Commission ("FCC) experimental authority to develop, test, and demonstrate radiofrequency equipment for export only (Radio Service Code "XE") that are designed to operate in the 1880-1920 MHz band.

As illustrated by the discussion below, the grant of this application will be in the public interest, as it will allow the company to develop innovative radiofrequency systems and devices that will meet the communications needs of the consumers.

Company Background:

Bosch Security Systems, LLC ("BSSLLC"), soon to be renamed "Keenfinity," is a global provider of security and safety solutions. It offers a wide range of products and systems, including video surveillance, intrusion alarm, access control, and fire alarm systems, as well as public address and voice alarm systems. Recently, BSSLLC was sold to Triton, a European investment firm.

Explanation and Purpose of Tests:

Under the experimental authority requested in this application, BSSLLC seeks to conduct research and development of digital wireless intercom systems based on the DECT (Digital Enhanced Cordless Telecommunications) standard which operates in the frequency range 1880-1920 MHz used in Europe, Japan, and South America. These systems are similar to those developed for use in the United States on a different frequency range and permitted to operate on an unlicensed basis in accordance with the FCC's Part 15 regulations.

These devices provide high-quality audio via digital wireless portable beltpacks and associated access points. This system, which is known as NOMAD wireless, is suitable for a wide range of professional intercom applications, including those that support broadcast production studios, theater and sports events, church and cathedral services, and commercial building communications.

Technical and Operational Specifications:

The devices to be tested under the requested experimental license have an occupied bandwidth of 1.24 MHz, utilize emission modulation techniques expressed by the designator 1M24F1D, and operate with a mean effective radiated power ("ERP") of 100 mW and a peak ERP of 250 mW. Not more than 50 portables, mobiles, and temporary fixed test devices at any one time will be deployed at each location or not more than an aggregate total of 150 devices at all locations.

The devices will not be marketed to the public, and all test devices will be retrieved and either rendered inoperable or exported outside the United States.

Test Locations:

The proposed locations at which these devices will be deployed are listed below. The devices would be operated within a 0.5-kilometer radius of the center coordinates provided for each location.

Location No. 1:

Lincoln Office
3401 Village Drive, Suite 101
Lincoln, NE 68516
NAD83 Coordinates: 40° 45' 12.94" N; -96° 40' 12.39" W

Location No. 2:

Speedway Village
345 Speedway Circle
Lincoln, NE 68502
NAD83 Coordinates: 40° 46' 55.04" N; -96° 42' 57.12" W

Location No. 3:

Burnsville Office
12000 Portland Avenue South
Burnsville, MN 55337
NAD83 Coordinates: 44° 47' 11.69" N; -93° 16' 10.83" W

Protection Against Interference:

BSSLLC recognizes that it must operate on a secondary, non-interference basis, and it must and will immediately cease its operations should interference occur. BSSLLC does not expect that its operations will cause interference, however, because: (1) the test devices will be operated at low power (100 mW mean ERP) in a limited geographic area (within 0.5 km of the center coordinates of each location); (2) it expects to conduct tests at only two locations at any given time and only once or twice a week during regular business hours from 8am – 6pm ET; and (3) BSSLLC will coordinate its activities to minimize the potential for interference to licensed operators in that area that may be affected by the tests.

Contact Information:

Should any interference occur, which the company does not expect, the "stop buzzer" contact for the proposed operations is provided below:

Stop Buzzer:

James Andersen, Principal Engineer
3401 Village Drive, Suite 101
Lincoln, NE 68516
Telephone: (402) 467-6671
Email: jim.andersen@keenfinity-group.com

Questions can also be directed to the company's corporate and legal contacts below:

Corporate Contact:

Kevin Moore, Director
Global Engineering & Technology
12000 Portland Avenue South
Burnsville, MN 55337
Telephone: (952) 736-3832
kevin.moore@keenfinity-group.com

Legal Contact:

Kurt E. DeSoto
Wiley Rein LLP
2025 M Street, N.W.
Washington, DC 20036
Telephone: (202) 719-7235
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