

NARRATIVE STATEMENT

(Amended March 13, 2015)

Pursuant to Section 5.3(b) and (e) and Section 5.61 of the Commission's rules, 47 C.F.R. §§ 5.3(b), (e), 5.61 (2013), GatesAir Inc. hereby respectfully requests special temporary authority ("STA") from **March 16 through September 16, 2015**, to operate in the 572-578 MHz band for the purpose of evaluating prototype next-generation TV standard (ATSC 3.0) broadcast technologies at a test site in Parma, Ohio.

A. Purpose of Operation and Need for STA:

GatesAir is actively involved with the ongoing work by the Advanced Television Systems Committee (ATSC) to develop the next-generation ATSC Digital standard. The requested STA will be used to test the various components being proposed for the new standard as well as allowing for a comparison to the existing standard. Specifically, grant of an STA will allow GatesAir to evaluate prototype technologies and obtain feedback so that it may enhance the industry's efforts to design, develop and improve next-generation broadcast services available to viewers.

In order to conduct a meaningful field test, it is necessary to deploy a full scale system. No programming would be received or viewable by the general public during these tests, however.

To accommodate all activities during the evaluation (from the installation to tear-down) covered by the requested authorization, GatesAir respectfully requests that the FCC grant the STA for the period March 16 through September 16, 2015.

B. Location of Proposed Operation:

GatesAir proposes to conduct the demonstrations at its site in Parma, Ohio. The address and reference coordinates for the test location are provided below:

4501 W Pleasant Valley Road
Parma, Ohio 44134

41° 21' 48.0" North Latitude
-081° 42' 57.0" West Longitude

Datum: NAD83

C. Technical Specifications:

1. Frequencies Desired

GatesAir requests authorization to operate in the 572-578 MHz band previously used during the DTV transition.

2. Effective Radiated Power

All power levels will comply with the limits set forth in the FCC's rules, including those relating to human exposure to radiation. The transmitter will be configured to operate at a maximum mean power level of 600 kW effective radiated power ("ERP"). GatesAir will reduce the actual powers to the minimum power needed for successful operation, based on set-up and testing at the demonstration site.

3. Modulation and Emissions

GatesAir proposes to operate using ATSC 3.0-type modulation. The primary emission designator is 6M00W7W. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequency bands requested. In addition, the proposed facility will fully comply with the existing emission mask to limit any harmful out of band emissions.

4. Antenna Information

The proposed facility will utilize a channel 31 transmission system previously operated during the DTV transition. An omni-directional antenna will be located on a tower currently registered under ASR number 1054608 (copy attached) and will be positioned below the licensed channel 8 antenna of Television Station WJW Cleveland, Ohio; therefore, there will be no increase in the overall tower height.

The height of the antenna for the transmitter is 245 meters and the ground elevation is 354 meters above mean sea level. No antennas will be mounted in a fashion that will require further approval under FAA and FCC rules and regulations.

D. Protection Against Causing Interference:

As noted above, the proposed facility will utilize a channel 31 transmission system previously operated during the DTV transition. Because the nearby co-channel and adjacent channel environment has changed very little since the end of the DTV transition, GatesAir expects that it will be possible to deploy the proposed facilities without causing any new interference to any other existing station. An OET-69 study was performed (results attached) which verifies that, except as discussed below, no new interference will be caused to other broadcast stations or operations. In addition, an allotment for this channel has previously been agreed to by Canada with parameters that are even slightly higher than herein proposed (625 kW vs. 600 kW); therefore no additional international coordination is required.

The only adversely affected station will be a nearby adjacent channel Low Power Television Station (WRAP-LP channel 32). GatesAir has coordinated with the owner of that station, however, and has obtained its consent to the proposed test operation.

Furthermore, as noted above, the length of the demonstration period is short, extending only from March 16 through September 16, 2015. Test operations would not be continuous during this period, however. GatesAir has requested an STA to cover a six-month time period to provide it with flexibility to conduct tests from time to time during the term of the STA. Specifically, GatesAir anticipates that it will conduct a limited number of tests a few weeks apart.

Last, GatesAir has taken steps to protect against interference to other licensees in the area, including auxiliary broadcast licensees authorized under Part 74 of the FCC's rules. It has already discussed the proposed operation with the local Society of Broadcast Engineers ("SBE") frequency coordinator and will continue to coordinate with Part 74 licensees through the local SBE frequency coordinator before commencing any test operations.

E. Restrictions on Operation:

GatesAir is not seeking authority to perform a market study under this STA. As noted above, no programming would be received or viewable by the general public during these tests. Moreover, no fees will be charged to entities using the equipment during this test. After the test is completed, GatesAir will disassemble the demonstration facilities.

GatesAir also recognizes that any experimental authority must not cause harmful interference to authorized facilities. In the unlikely event interference occurs, GatesAir will take immediate steps to resolve the interference, including discontinuance of operation if necessary.

Entities will be advised in accordance with Section 2.803 of the Commission's rules, 47 C.F.R. §2.803 (2013), that any unapproved devices used during the evaluation which have not been authorized as required by the FCC are not being offered for sale or lease, or sold or leased, until authorization is obtained.

F. Public Interest:

GatesAir submits that issuance of an STA as requested is in the public interest, convenience, and necessity. Grant of an STA will help GatesAir to develop innovative equipment that will accommodate the needs of the viewing public.

G. Contact Information:

For questions about this application, please contact:

John Burgett
Wiley Rein LLP
1776 K Street, N.W.
Washington, DC 20006
Telephone: (202) 719-4239
Facsimile: (202) 719-7207
jburgett@wileyrein.com

In the unlikely event interference concerns should arise during the period of authorization for this STA, please contact either:

Jay C. Adrick
Technology Advisor
GatesAir Inc.
5300 Kings Island Dr., Suite 101
Mason, OH 45040-2353 USA
Office: (513) 561-3037
jay.adrick@gatesair.com

Dennis Wallace
Meintel, Sgrignoli, & Wallace, LLC
1282 Smallwood Drive, Suite 372
Waldorf, MD. 20603
(202) 251-7589
Dennis.Wallace@mswdtv.com