

GENERAL DYNAMICS
Armament and Technical Products

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Vice President and General Counsel

September 5, 2008

FILED ELECTRONICALLY

Federal Communications Commission
Office of Engineering and Technology
Experimental Licensing Branch
Washington, DC. 20554

**Re: Request for Expedited Processing and Grant for an STA to Commence on
September 12, 2008, at Ethan Allen Firing Range, Jericho, VT**

General Dynamics Armament and Technical Products, Inc.

Application For Special Temporary Authority
File No. 0475-EX-ST-2008

Dear Sirs:

On behalf of General Dynamics Armament and Technical Products, Inc. ("GDATP"), this letter is to request expedited processing of the above-referenced application ("STA Request") wherein GDATP asked the Commission to grant special temporary authority ("STA") permitting GDATP to operate the facilities specified in the STA Request for a six month period commencing September 12, 2008.

In support of this Request, the following is offered:

- **Urgent Military Need for Development of UAV/UAS Technology.** The subject experiment represents a unique opportunity for rapid development, testing, and demonstration to key representatives of the U.S. Armed Forces of state-of-the-art unmanned aerial surveillance technologies. This effort represents a cooperative effort between GDATP and the U.S. Army's Ft. Benning Infantry Battle Lab, and responds directly to Defense Secretary Gates' recent comments seeking more rapid deployment of such surveillance technologies.¹ This cooperative effort is consistent with Secretary Gates' UAV initiatives, including his establishment of a new UAV task force. Id. The goal of this testing is to provide persistent,

¹ Defense News, Published April 21, 2008 (<http://www.defensenews.com/story.php?i=3490138>).

responsive battlefield surveillance at small unit echelons, and thereby provide warfighters the timely information they need to mitigate battlefield threats and reduce American casualties.

- Full Cooperation with Ft. Benning Infantry Battle Lab and Yuma Proving Ground Personnel. The near-term testing under this STA is fully supported by the U.S Army's Ft. Benning Infantry Battle Lab and Yuma Proving Ground personnel. As an initial matter, GDATP's involvement in this experiment is the result of its participation in a cooperative U.S. Army/industry experiment sponsored by the Ft. Benning Infantry Battle Lab. In addition, Yuma Proving Ground personnel will be observing the tests at the Ethan Allen Firing Range for the purpose of preparing a safety report, which must be completed prior to October 15, 2008. In order to timely complete the safety report, the safety assessment must be completed no later than September 23, 2008. This safety report is a condition precedent to the performance of subsequent full-scale tests at Ft. Benning next month. Equipment and personnel in support of these tests will be arriving at the Ethan Allen Firing Range from overseas in a matter of days. Accordingly, to meet these timetables, grant of this STA is required by September 12, 2008. A six (6) month STA (9/12/08-3/12/09) is required due to the need for continued follow-on training of military personnel operating this technology.
- Near-Term Grant Required Due to Presence of High-Level Military Personnel. As explained above, the near-term grant of the STA by September 12, 2008, is necessary because numerous personnel from Yuma Proving Ground will be observing the tests for the purpose of preparing a safety report, which must be completed prior to October 15, 2008. In order to timely complete the safety report, the safety assessment must be completed no later than September 23, 2008. Accordingly, to meet these timetables, grant of this STA is required by September 12, 2008.

GDATP has never had to approach the Commission with an STA request with a turnaround time as quick as the timetable requested in this filing, and GDATP apologizes for the filing of this STA Request so close to the required Start Date in this instance. However, GDATP was made aware of the need for Commission approval for these tests just 2 days ago by the relevant AFMO, and the need to file this STA Request is outside the control of the Company. GDATP apologizes for any inconvenience that the processing of this request may cause to the Branch and the staff.

- Extremely Limited Scope of Experiment

Expeditious processing of this STA Request should be assisted due to the extremely limited scope of the experiment. Specifically:

- Authority is requested for only limited and sporadic operation of the facilities during the authorized timeframe. Specifically, operation of the facilities will occur only from approximately 7am-4 pm (ET). In addition, during those hours, operation will be sporadic, not continuous. Training flights are envisioned to be only approximately 2 hours each.
- AFTRCC coordination is being conducted and the results of such coordination will be provided to the Commission promptly upon completion.
- If necessary, GDATP can blank out any problem frequencies within the requested band of operation.

GDATP is well aware that requests to expedite processing and grant of experimental applications such as this STA Request place additional requirements on the Commission's already strained resources. For that reason, GDATP submits expedite requests only in the most urgent circumstances and where no other alternative exists. For the reasons set forth above, GDATP has demonstrated the urgent need for expedited processing in this particular case. GDATP greatly appreciates the Commission's attention to this matter.

Should any questions arise with respect to the instant STA Request, please do not hesitate to contact undersigned.

Sincerely,



Douglas P. DeMoss

Cc: Richard Scheps