

To: Tim Royce
E-Mail: TRoyce@gdatp.com
From: Doug Young
Date: September 25, 2006

Subject: Request for Info - STA File #0697-EX-ST-2006

Message:

1. Requests for expedited processing for six-month STAs with no firm, documented scheduling dates draw several suspicions. Is this part of a long-term project that should have been filed on a Form 442 but wasn't to avoid the difficulties associated with getting high-power, wide-spectrum applications approved for insertion in the Government Master File (GMF)? How long has the applicant known of their contract?

2. Requesting 8-18 GHz at 2 kW ERP and wanting it quickly is a tall order. This application will need to be coordinated with NTIA and three FCC bureaus. 47CFR5.85(b) speaks of assigning no more than one frequency in a band unless a showing is made that more than one is necessary. We generally interpret this as meaning that the applicant shall request the minimum amount of spectrum necessary to accomplish the experiment's goals. This means we will approve bands, but we still need to limit the amount of spectrum granted. 47CFR5.111(a)(2) states that the power radiated shall be reduced to the lowest practical value consistent with the program of experimentation. Two thousand watts ERP seems excessive. Also, powers this large raise concerns about radiofrequency exposure. Has an environmental assessment in accordance with 47CFR1.1307 (as corrected in Federal Register Vol. 71, No. 50) been made? Please address these issues.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of September 25, 2006 may result in application dismissal pursuant to Section 5.67 and forfeiture of the filing fee pursuant to Section 1.1108.

DO NOT Reply to this email by using the 'Reply' button. In order for your response to be processed expeditiously, you must upload your response via the Internet at <https://gullfoss2.fcc.gov/prod/oet/cf/els/index.cfm> by clicking on the "Reply to Correspondence" hyperlink.

Responses to this correspondence must contain the Reference number : 4567