

Subject: Request for Info - STA File # 0399-EX-ST-2005

1. Is it correct to say that the transmission is centered on 2500 MHz with a bandwidth of 300 MHz, as it appears in the data entry?

The transmission is centered on 2500 MHz. Initially it was believed that 300 MHz would effectively identify the total bandwidth of emissions from that center frequency. While the most significant amount of detectable emissions will pertain to that 300 MHz band, Gibbons herein seeks, out of an abundance of caution, to clarify the bandwidth consistent with the definition used in the Section 2.202 of the Commission's rules regarding "occupied bandwidth".

To that extent, the total occupied bandwidth of spectrum is technically 625 MHz. This bandwidth coincides with the following additional technical information:

$EIRP = P_{max} = 1W$

$P_{av} \leq 173 \text{ mW}$ in any 0.37 ms window

$P_{av} \leq 64 \text{ micro-Watts}$ over any one-second window.

In a typical test, Gibbons will transmit probably once per ten seconds, and each transmission will consist of a burst of short pulses with low duty cycle, totaling only tens of microseconds of on-time. The most intensive operation during testing will probably be sending one transmission each 10 seconds or longer interval, each transmission comprising about 64 microseconds of actual transmission at the 1W power identified in the application and above. Because these signals have such low energy -- a few micro-joules per transmission -- and so few transmissions, and because the signal structure is designed to have a minimum of repeating elements, Gibbons believes its signal poses no threat of interference with other users.

2. Can your areas of operation be described with center coordinates and radii of operation? This is preferred if possible.

We herein revise the area of operation to confirm to a 10km radius around three centerpoints. (All coordinates in NAD-83.)

Location 1:

37°29'34.79" N 122°18'36" W

Location 2:

37°29'49.2" N 122°13'30" W

Location 3:

42°35'51" N 71°22'0.48" W

3. Is the 07/18/2005 requested start date a hard start date as required by some firm schedule? If so, explain. Government agencies that this application will need to be coordinated with usually request at least two weeks to analyze.

Owing to the time it has taken to reply to the Commission's request for additional information and to the fact that sufficient time is required for other agencies to comment on Gibbons' application, we herein request that the date to commence operations be modified to 9/1/2005.

Under our government contract we are required to execute our initial outdoor "Contractor Test" in mid-October 2005. Our requested start date of 9/1/2005 will permit us to take data and make technical adjustments in preparation for that test.