

From: Karl Knoblock

To: Doug Young

Date: February 27, 2008

Subject: Request for Info - File #0098-EX-PL-2008

---

Message:

Re: Application for Experimental License File #0098-EX-PL-2008

1. This application has made some overly broad requests. If the equipment is being tested prior to certification, why should it take five years? Normally, this office will not grant anything longer than six months for equipment waiting to be certified. Submit a better justification for a five-year license, if there is one.

This request is not necessarily for equipment that is waiting for certification but rather for equipment that is in the design and development stage. A five year license would be preferred because the development cycle for our products can sometimes last longer than two years.

2. This office does not like to grant nationwide authority. Trade show demos are better handled in STAs. Why is testing necessary at more than a small number of locations? Limit the application request to a small number of locations or come up with a more descriptive and thorough reason for us to consider nationwide authority. Nationwide authority makes it very difficult to determine interference and to coordinate.

We have portable equipment that we need to take on a moments notice to customer demos so the STA's would not be appropriate for this. According to Section 5.3 Scope of Service: "Stations operating in the Experimental Radio Service will be permitted to conduct the following type of operations:

(d) Technical demonstrations of equipment or techniques.

(f) Demonstration of equipment to prospective purchasers by persons engaged in the business of selling radio equipment."

We put our equipment through extensive field testing during product development which may be at various locations throughout the United States. Sometimes customers have special requirements that need to be tested at their place of business in order to verify our equipment will provide the necessary level of service.

3. You have asked for 264 MHz of broadcast spectrum. How do propose to coordinate with regular licensees of the spectrum and prevent interference, especially on a nationwide basis?

The frequencies of our equipment, as defined under Part 74, will be selected in different locations so as to mitigate any interference with existing licensed users. The operation of this equipment will be coordinated with the Society of Broadcast Engineers.