

To: Jonathan Mirsky
E-Mail: jmirsky@harriswiltshire.com
From: Doug Young
Date: December 04, 2008

Subject: Request for Info - File #0463-EX-PL-2008

Message:

It is true that the Experimental Licensing Branch does not normally consider extensions of STA. However, there are exceptions. This experiment fits some of those exceptions. Since the applicant is requesting continuing operation of around six months rather than the standard licensing period of two years, that is one exception. A second exception is that coordinating STAs with the federal government is significantly simpler than the coordination of regular experimental license applications. Coordination of regular experimental licenses requires preparation of the frequency data for entry into the Government Master File. Each frequency is assigned a serial number. Since you are using 954 frequencies, that requires 954 serial numbers and this office is only allotted 10,000 serial numbers per year. Preparation of the data also requires the hand-entry of each frequency since the data as submitted are not in the proper format. This office does not have the resources to enter and massage the data for 954 frequencies.

We respectfully request that you re-file your application as an STA. You may use either the current filing or the previous STA as a template. Using the previous STA would probably result in the least amount of effort. You may also request that the fee for the current application be used toward the STA filing since this office is requesting the re-filing. Given the circumstances, if the testing looks like it will take more than an additional six months, this office would be predisposed to accept one more STA extension after the one to be filed now. Since the original request for this experiment was filed as an STA (meaning a temporary operation), it is fully expected that without extreme extenuating circumstances, eighteen months should be more than enough time for you to determine the feasibility of your new technology.

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 December 04, 2008 may result in application dismissal pursuant to Section 5.67 and forfeiture of the filing fee pursuant to Section 1.1108.

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