

2 September 2026

Federal Communications Commission
Office of Engineering and Technology
Experimental Licensing Branch
45 L Street NE, Washington, DC 20554

Re: File No. 1467-EX-ST-2026 — Request for Confirmation that FAA Pre-Coordination Is Not Applicable

Correspondence Reference Nos. 103985 and 104904 | Grantee Code PD9

Dear Sir or Madam,

Intel Corporation (“Intel”) respectfully submits this letter in support of the above-referenced application for Special Temporary Authority. Intel requests that the Commission confirm that the FAA pre-coordination requirement identified under Correspondence Reference Nos. 103985 and 104904 does not apply to the operation proposed in this application, and that the application be permitted to proceed to grant without further FAA coordination.

Intel has attempted in good faith to satisfy the pre-coordination requirement through the channel identified by the Commission. As set out below and evidenced in the attached exhibits, the *FAA Aviation Special Event Frequency Application* to which Intel was directed cannot be completed truthfully for this operation, because its mandatory fields presuppose an aviation event and aeronautical communications, neither of which is present here.

1. Background

The Commission identified an FAA pre-coordination requirement for the requested frequencies 5151–5249 MHz under Correspondence Reference No. 103985, and subsequently issued a reminder under Reference No. 104904. Intel responded on 5 August 2026 requesting guidance on the applicable FAA process and documentation, and followed up on 28 August 2026. A separate request for a letter of confidentiality (Reference No. 104399) was satisfied on 10 August 2026.

By e-mail of 31 August 2026, the Commission advised that “[b]ased on the requested frequencies of operation, the FAA requires coordination in the 5000-5250 MHz band,” and directed Intel to the FAA WebFCR portal and, for air shows or special events, to the *FAA Aviation Special Event Frequency Application*. Intel has registered for a WebFCR account, which remains pending administrator approval, and has separately examined the Aviation Special Event application form.

2. The Proposed Operation

The proposed operation is short-term, indoor Bluetooth interoperability testing conducted in a hotel function room in support of a Bluetooth Special Interest Group interoperability event. The relevant parameters are as

follows:

Applicant	Intel Corporation (FCC Grantee Code PD9)
Purpose	Bluetooth Higher Bands interoperability testing; Bluetooth SIG interoperability event
Dates	14 – 20 September 2026
Location	Hyatt Regency Bellevue, 900 Bellevue Way NE, Bellevue, WA 98004 — indoor, hotel function space
Frequencies	5151 – 5249 MHz (U-NII-1)
Bandwidth	2 MHz maximum
Maximum EIRP	13 dBm (20 mW) — 11 dBm conducted plus 2 dBi antenna gain
Modulation	Bluetooth Low Energy (BLE) high data throughput only; Wi-Fi transmission disabled on all units
Equipment	Intel BN201NGW (Intel Wi-Fi 8 BN201), internal designation “Pelican Peak 2”; variant BN201D2W
Antennas	Off-the-shelf 2 dBi external antennas
Quantity	Three stationary test setups, co-located in a single room
Mobility	None. No outdoor, mobile, or airborne emitters.

No aviation function of any kind is involved. There is no air show, no aircraft, no air traffic control or advisory function, no air-to-air or air-to-ground communication, and no operation at or in connection with any airport.

3. The Designated FAA Form Cannot Be Completed for This Operation

The FAA *Aviation Special Event Frequency Application* is, by its structure and its express terms, an instrument for assigning temporary air-to-ground frequencies to aviation events. The FAA’s own companion guidance, *Procedures for assigning temporary A/G frequencies for Air Shows*, directs applicants to obtain a coordination number from an ATO Service Area airshow coordinator and thereafter to apply to the Commission on FCC Form 601 for a licence in radio service “AF – Aeronautical and Fixed.” That sequence has no application to a Part 5 experimental authorisation for indoor Bluetooth testing.

The mismatch is not merely one of framing. Several mandatory fields cannot be answered truthfully. The following exhibits are screen captures of the live form taken on 2 September 2026.

Exhibit A — “Define the User of the frequency(ies)”

Define the User of the frequency(ies)

☐ FAA Air Traffic Controllers

☐ DoD Air Traffic Controllers

☐ Non-Federal Air Traffic Controller

☐ Air Boss (Advisory Service Only)

Every available option identifies a category of aviation personnel: FAA, Department of Defense, or non-Federal air traffic controllers, or an Air Boss providing advisory service. None describes the actual user. The frequencies will be used by Intel test engineers operating stationary Bluetooth test devices indoors. Intel has made no selection in this section, as any selection would be a misrepresentation.

Exhibit B — “Define the Area of Operations”

Define the Area of Operations

Radius of Operation (Nautical Miles) *

Maximum Altitude (Above Mean Sea Level (feet)) *

Communication to the airshow aircraft on a requested frequency (ies) **MUST** be limited to the radius and flight level specified.

*The explanatory text states that “[c]ommunication to the airshow aircraft on a requested frequency(ies) **MUST** be limited to the radius and flight level specified.” The form thus presumes communication with airshow aircraft. Intel’s operation involves no aircraft and no airborne emissions; the mandatory “Radius of Operation” and “Maximum Altitude” fields describe an operational envelope that does not exist here.*

Exhibit C — “Event and Contact Information”

Event and Contact Information

Name of the Event *

Airport IDENT *

Event Coordinator Email (POC) *

POC Name *

“Airport IDENT” is a mandatory field. Intel’s operation has no associated airport. It takes place in a hotel function room in downtown Bellevue, Washington, approximately six to seven nautical miles northeast of Boeing Field / King County International Airport (KBFI). Any entry in this field would be a geographic reference only and would risk being read as a claim of operation at an airport.

Exhibit D — Transmitter site fields

City/Town
State/Province - None -
Transmitter Latitude (deg:mm:sec) *
Transmitter Longitude (deg:mm:sec) *
Site Elevation (Above Mean Sea Level (feet) *)
Transmitter Equipment Manufacturer and Model Number *
Transmitter Antenna Height (Above Ground Level (feet)) *

The transmitter fields are those of a fixed aeronautical ground station supporting an event: site elevation above mean sea level, antenna height above ground level, and a single surveyed transmitter position. Intel's emitters are three portable devices on a table in a room, relocated as testing requires within that room.

4. Interference Potential

Independently of the form's inapplicability, the proposed operation presents negligible potential for interference to any aeronautical service. The maximum EIRP is 13 dBm, or 20 milliwatts, across an occupied bandwidth of 2 MHz, radiated from within a building. That is approximately 17 dB below the 30 dBm EIRP at which unlicensed U-NII-1 devices are permitted to operate in this identical band under Section 15.407 of the Commission's Rules, without individual FAA coordination and in very large numbers throughout the United States, including at and around airports.

Intel notes that it seeks experimental authority because the equipment is pre-production and the modulation is not yet certified, not because the emission is of a character or magnitude that Part 15 devices in this band do not already present. Intel is prepared to accept a condition limiting operation to indoor use and to reduce power further if that would assist, as the testing is functional rather than performance-related and the units operate in close proximity to one another.

5. Relief Requested

Intel respectfully requests that the Commission confirm that FAA pre-coordination is not required for the operation described above and permit File No. 1467-EX-ST-2026 to proceed to grant. In the alternative, if the Commission determines that coordination remains necessary, Intel requests that it be directed to the specific FAA process and point of contact appropriate to a non-aviation, indoor, low-power operation, since the form to which Intel has been referred cannot be completed truthfully.

This request is time-critical. The event begins on 14 September 2026. Intel has been seeking guidance on this requirement since 5 August 2026 and remains willing to provide any further technical detail on request, or to discuss the matter by telephone at the Commission's or the FAA's convenience.

Respectfully submitted,



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Exhibits A–D are screen captures of the FAA Aviation Special Event Frequency Application as presented at faa.gov on 2 September 2026.