

From: Robert Wright

To: Behnam Ghaffari
Date: August 10, 2012

Subject:

Message:

August 10, 2012

Reference number: 17564

Subject file: 0554-EX-ST-2012

The above-referenced correspondence received from the Experimental Licensing Branch states that the Commission is unable to grant the application because "the requested band does not adhere to the established 4 GHz channel plan in Chapter 4 of the NTIA manual and if the commercially available data link equipment is developed, the government agencies would not be able to use it."

We disagree with the reasoning stated in the dismissal correspondence. We think that the STA request should be re-considered. We do not think that anything needs to be changed in the original application; what is presented here is just clarification of what is in the request.

1. We stated in our application that the equipment, which is manufactured by Cambium Networks as model number PTP45600, is not experimental. In addition, the PTP45600 has obtained stage 4 NTIA spectrum certification under docket number SPS-17231/4, signed by Mr. Butcher and Mr. Davidson on 10 February 2011, for some limited Department of Interior (National Park) locations. The only difference between the certified equipment and this request is that we propose use of an external, narrow-beam antenna (3.6 degree half-power beamwidth) versus the built-in flat panel antenna (11 degree half-power beamwidth). The equipment, as manufactured, has provisions for use of an external antenna like this.

2. The requested frequency band, 4460-4600 MHz, is a subset of the equipment's capability and the range over which NTIA has certified stage 4 support (4400-4600 MHz). We selected this subset because we do not need the entire frequency range, and a similar, previous STA grant (see 0743-EX-ST-2011, call sign WF9XIJ) in the Salt Lake City area contained a special condition that required notching out the frequency band 4435.75-4454.25 MHz. We anticipated the same special condition being applied here. We thus exclude some of the NTIA-designated 4 GHz channels from consideration.

3. Regarding the 4 GHz channel plan given in paragraph 4.3.18 of the NTIA manual, the equipment manufacturer states in their documentation that the PTP45600 operates in 10MHz (?D?), 20 MHz (?C?), and 40 MHz (?A?) channels. The 30 MHz (?B?) channels are left out because the PTP45600 tuning steps of 2 MHz do not allow the widest emission (28M7D1D) to align with any of the NTIA-defined ?B? channels. Similarly, 9M57D1D does not align with the NTIA ?D? channels, and so is designated to operate in ?C? channels. With this in mind, the following lists the requested emission designators and how they would be assigned to NTIA-designated channels. Only one emission at a time is required.

- ? 28M7D1D operates in channel A3, A4, or A5
- ? 19M1D1D operates in one channel in the range C4-C10
- ? 14M4D1D operates in one channel in the range C4-C10
- ? 9M57D1D operates in one channel in the range C4-C10
- ? 4M79D1D operates in one channel in the range D7-D20

We hope that this provides sufficient information to justify reconsideration and approval of our STA request.

We neglected to include cease buzzer PoCs in our original request. They are as follows:
Rick Kunz (801)628-3602
Bing Shen (801)706-0270

Respectly submitted,

Robert A. Wright
Consulting Engineer
L-3 Communications
Communication Systems ? West
Salt Lake City, UT
(801)594-2149
Bob.Wright@L-3com.com