

NARRATIVE STATEMENT

Pursuant to Section 5.3(j) of the Commission’s rules, 47 C.F.R. §§ 5.3(j) (2013), the Laufer Wind Group LLC (“LWG”) hereby respectfully requests an experimental license to operate on 1030 MHz for the purpose of evaluating the compatibility of traffic collisions avoidance systems (“TCAS”) with radar activated FAA obstruction lighting systems being designed by LWG for wind farms. Grant of this request would supplement the research and development LWG is conducting under its existing experimental authority issued under call sign WF2XVD.

The following information is provided in support of this application:

A. Purpose of Operation and Need for License:

The Laufer Wind Group LLC is a wind energy consulting and engineering firm specializing in new technology evaluations and development. It is developing the Aircraft Detection Sight Solution (“ADSS”) to address the competing needs of the wind energy and aviation industries. The ADSS is also designed to balance FAA lighting requirements with the nuisance light concerns of local communities, one of the main impediments to wind energy development in the United States.

LWG proposes to evaluate the compatibility of the ADSS with TCAS equipment typically found on aircraft. Although, the ADSS relies on its primary radar to detect the presence of aircraft, LWG is interested in examining the feasibility of supplementing the primary radar with the information available from TCAS equipment. Specifically, LWG seeks to determine whether the interrogation functionality of TCAS equipment may be incorporated into the ADSS to collect range, bearing and other information about aircraft near a wind farm to enhance the capability, performance and reliability of the ADSS system. LWG does not propose to operate transponders as part of its experimentation, however; thus, the test equipment will not reply to interrogations from aircraft or secondary surveillance radar (“SSR”) systems.

B. Location of Proposed Operations:

LWG proposes to deploy test equipment at the following two locations:

Additional Location	Coordinates (NAD83)
<u>Location No. 1:</u> Up to 4 temporarily fixed base stations within a 3 km radius of 10 Commerce Park N. Bedford, NH 03110	40° 30' 42.6" North Latitude 71° 27' 35.6" West Longitude
<u>Location No. 2:</u> Up to 4 temporarily fixed base stations within a 3 km radius of National Renewable Energy Laboratory Rocky Flats, CO	39°54'35.2" North Latitude 105°13'33.7" West Longitude

C. Technical Specifications:

1. Frequencies Desired

LWG requests authorization to operate on 1030 MHz. The tests will be conducted using channels with bandwidths of 6 to 12 MHz within that band, as described in Section C.3 below.

2. Effective Radiated Power

All operations will be conducted consistent with Part 5 and Subpart Q of Part 87 of the FCC Rules, 47 C.F.R. Parts 5, 87 (2013). For example, all power levels will comply with the limits set forth in those rules. The equipment will operate with a duty cycle of .001 or less and at a peak effective radiated power (“ERP”) level 40 Watts or less. Moreover, LWG will limit the power, area of operation, and transmitting times to the minimum necessary to evaluate the system.

3. Modulation and Emissions

The primary emission designators for the proposed operations are 6M80K2D and 12M0M1D. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequency bandwidth requested.

4. Antenna Information

The antennas will be located outdoors at temporarily fixed locations identified in Section B. No antennas will be mounted in a fashion that will require approval under FAA and FCC rules and regulations.

5. Equipment To Be Used

LWG proposes to conduct its tests at each site with up to four (4) temporarily fixed devices installed within a radius of approximately 3 km from the coordinates specified in Section B above. In accordance with Section 87.155 of the FCC’s rules, 47 C.F.R. § 80.145 (2013), LWG will use certified equipment in connection with its tests. For example, it currently proposes to deploy devices certified by Avidyne Corporation under FCC I.D. No. RZYTAS6XX-A, but LWG may use other authorized equipment as needed.

D. Protection Against Interference:

As noted above, LWG does not propose to operate transponders (e.g., transmitting on 1090 MHz) as part of these tests. Thus, aircraft with TCAS capabilities and ground based SSR systems would not receive replies that could interfere with TCAS or SSR operations.

Moreover, LWG recognizes that the operation of any equipment under experimental authority must not cause harmful interference to authorized facilities, including the facilities of other experimental licensees in this band. Accordingly, it will coordinate with any licensees, as required by FCC rules, before commencing operations and will limit the power, area of operation, and transmitting times to the minimum necessary to evaluate the system. Moreover, should interference occur, LWG will take immediate steps to resolve such interference, including if necessary arranging for the discontinuance of its operations.

E. Restrictions on Operation:

LWG is not seeking authority to perform a market study under this experimental license. Moreover, no fees will be charged to entities using the equipment during these tests. After the tests are completed, LWG will recall and recover all devices that do not comply with FCC regulations.

In addition, LWG will advise entities using the equipment that permission to operate has been granted under experimental authority issued to the Laufer Wind Group LLC, that such operation is strictly temporary, and that the equipment may not cause harmful interference. Entities will also be advised in accordance with Section 2.803 of the Commission's rules, 47 C.F.R. §2.803 (2013), that any unapproved devices have not been authorized as required by the rules of the FCC and are not being offered for sale or lease, or sold or leased, until authorization is obtained.

F. Public Interest Statement:

LWG submits that modification of its experimental license as requested is in the public interest, convenience, and necessity. Grant of the application will allow LWG to expand its tests and demonstration of prototype equipment to enhance the company's efforts to design and develop a solution to address the competing needs of the wind energy industry, the aviation industry, and local communities.

G. Contact Information:

For questions about this application, please contact FCC Counsel to the Laufer Wind Group LLC:

David E. Hilliard
Kurt E. DeSoto
Wiley Rein LLP
1776 K Street, N.W.
Washington, DC 20006
Telephone: (202) 719-7000
Facsimile: (202) 719-7207
dhilliard@wileyrein.com
kdesoto@wileyrein.com

In the unlikely event interference concerns should arise, please Mr. Laufer at the address below. Mr. Laufer will also serve as the designated point-of-contact (stop buzzer) to terminate transmissions if interference occurs:

Eric Laufer, President
Laufer Wind Group LLC
270 Lafayette St., Suite 1402
New York, NY 10012
Telephone: (212) 792-3912
Facsimile: (866) 381-5291
elaufer@lauferwindgroup.com