

Narrative Statement of COM DEV Wireless

COM DEV plans to utilize the following frequency bands currently licensed to Alpine PCS as stations KNLF 333 and KNLF 334 (See Attached Joint Testing Agreement at Exhibit 2):

Tx: 1850 MHz – 1910 MHz Block C
Rx: 1930 MHz – 1990 MHz Block C

The mobile terminals that COM DEV is using will have a mean EIRP of 25 dBm, peak EIRP of 250 dBm.

COM DEV is using IS-856 modulation, with a bandwidth of 1.25 MHz. This bandwidth was determined based on the IS-864 standard.

The proposed trial period is 180 days with a commencement date of the week of April 23, 2001. This mobile testing is in conjunction with base station testing previously approved by the FCC under call sign WC2XPJ.

The trial system will consist of two phases: (1) single site testing, and (2) multi-site testing. The first phase will consume the first 90 days of testing, while the second phase will follow immediately after, covering the second 90 days of the trial period. The trials will be used to validate simulation models and test the system's ability to deliver high-speed Internet services to mobile users.

Phase one will consist of a single Access Point with two sectors. The Access Point will be located in Paso Robles, CA (site #4). Twenty-four mobile terminals will be used during this phase of the trial. These terminals will be moved around the two sectors covered by the Access Point.

Phase one is intended for the testing of real-life environmental factors on the propagation of the IS-856 modulation. Intra-Access Point handoffs at a variety of speeds will be performed. Capacity and loading tests of an Access Point will also be performed during this phase of the trial.

Phase two of the trial will consist of three Access Points (sites 1-3) with a total of six sectors of coverage between them. The three Access Points will be located so as to cover geographically connected areas in Santa Maria, Nipomo and Guadalupe. Twenty-four mobile terminals will also be used during this phase of the trial. These terminals will be moved around the six sectors covered by the three Access Points.

Phase two testing will include additional real-life environmental factors not covered by the Paso Robles site. In addition, Inter-Access Point handoffs at a variety of speeds will be performed, including two and three Access Point soft-handoffs.

The Access Points referred to above are as follows:

1. Santa Maria Union Plaza Site
120 D North Broadway
Santa Maria, CA 93454

Coordinates: N. Lat. 34-57-15 / W. Long. 120-26-02 (NAD 83)

Ground Elevation: 66.7 meters
Tower Height: 36.57 meters (HAAT)

2. Nipomo PG&E Site
No address yet

Coordinates: N. Lat 35-00-28 / W. Long. 120-26-58 (NAD 83)

Ground Elevation: 89.9 meters
Tower Height: 60.96 meters (HAAT)

3. Guadalupe Site
4579 4th St.
Guadalupe, CA 93434

Coordinates: N. Lat. 34-57-51 / W. Long. 120-34-19.7 (NAD 83)

Ground Elevation: 25.6 meters
Tower Height: 12.19 meters (HAAT)

4. Bird Site
8560 Warren Road
Paso Robles, CA 93446

Coordinates: N. Lat. 35-43-33.2 / W. Long. 120-42-02.7 (NAD 83)

Ground Elevation: 262.13 meters
Tower Height: 38.1 meters (HAAT)

None of these four sites requires FAA Determination or FCC Antenna Structure Registration. All sites pass the slope test performed on the FCC's TOWAIR program.¹

Results from both phases of the trial will be recorded and fed back into simulation models to verify and improve capacity and coverage analysis of the system.

¹ These Access Points are the same sites used as transmitter sites in COM DEV's authorized testing under call sign WC2XPJ.