

STA REQUEST – NARRATIVE STATEMENT

Mitsubishi Electric Power Products, Inc. (“MEPPI”) hereby requests special temporary authority (“STA”) to test, evaluate and demonstrate its broadband over power line (“BPL”) equipment (the “Equipment”) in the San Diego, California area. The information below is provided pursuant to Part 5 of the rules of the Federal Communications Commission.

I. Need for Expedited STA

MEPPI respectfully requests expedited review of this STA request so that it immediately may commence testing of the BPL Equipment at the sites specified herein. MEPPI needs to construct and operate a BPL trial network in order to fully test the Equipment. These tests will be used, in part, to further the equipment certification process required by the FCC in its recent BPL Report and Order. Expedited consideration of this application is imperative given the upcoming July 7, 2006 deadline for certification. Grant of the STA is in the public interest because it will permit MEPPI to continue developing innovative solutions for its customers’ communications needs.

II. Overview of Proposed Operation

Through these tests, MEPPI will collaborate with power companies to test multiple aspects of the Equipment, including its performance, capacity, signal quality, data rates, interference potential and user acceptability.

III. Details of Proposed Operation

Details regarding the technical parameters of the proposed operation are provided below.

Time Period

Six months: July 10, 2006-January, 9 2007

Location(s)/ Geographic Area

San Diego, CA (San Diego County), in a 3-mile radius from the following center coordinates: 32°49’28” N, 117°13’01” W

Equipment

The Equipment will include 15 overhead nodes and 10 underground nodes, each comprised of 1 or 2 medium voltage cards and 1 low voltage card. The medium voltage cards will be used to inject and repeat the BPL signal on the medium

voltage lines, while the low voltage card is used to inject the BPL signal onto the low voltage line, bypassing the transformer. Depending on the number of medium voltage cards, 1 or 2 capacitive couplers will be used to inject the signal onto the line. One capacitive coupler will be used to in conjunction with the low voltage card to inject the signal onto the service wire. If necessary, a repeater will be deployed at the residential meter socket for the purpose of repeating the BPL signal before entering into the house.

Manufacturer: Mitsubishi Electric Corporation

Descriptions:

3 slot rack used to hold the MV and LV cards.
Model # MVE-AW10-W01-S
Max. # of units to be used: 25
of units to be used in residential environment: 25

MV card with “A” filter (used for modes 1 – 3)
Model # MVC-A10-02E0A
Max. # of units to be used: 15
of units to be used in residential environment: 15

MV card with “B” filter (used for modes 7 – 9)
Model # MVC-A10-02E0B
Max. # of units to be used: 10
of units to be used in residential environment: 10

LV card with “A” filter (used for modes 1 – 3)
Model # LVC-A10-02E0A
Max. # of units to be used: 15
of units to be used in residential environment: 15

LV card with “B” filter (used for modes 7 – 9)
Model # LVC-A10-02E0B
Max. # of units to be used: 10
of units to be used in residential environment: 10

Computer modem (customer premise equipment)
Model # CPE-A10-01
Max. # of units to be used: 20
of units to be used in residential environment: 20

Repeater with “A” filter (used for modes 1 – 3)
Model # TDR-A10-01E0A
Max. # of units to be used: 10
of units to be used in residential environment: 10

Repeater with “B” filter (used for modes 7 – 9)
Model # TDR-A10-01E0B
Max. # of units to be used: 10
of units to be used in residential environment: 10

Emission designator: 32M0D1D

Frequency Range

2 to 34 MHz

Maximum ERP or EIRP, if applicable

Tests will comply with Part 15 emissions limits.

IV. Certifications

MEPPI certifies as follows regarding the proposed operations:

- (i) It will not market, sell or lease equipment to end users;
- (ii) It will not charge fees for use of equipment;
- (iii) At the conclusion of the testing period, it will recall and recover all devices that do not comply with FCC regulations;
- (iv) It understands that operation of unapproved devices must not cause harmful interference and will take steps to resolve any interference, including discontinuance of operation;
- (v) It will advise users that use is pursuant to experimental STA, is strictly temporary, and may be canceled at any time; and
- (vi) Equipment will contain a conspicuous label with the following statement(s):

“Permission to operate this device has been granted under experimental authority issued by the FCC, is strictly temporary, and may be canceled at any time. This device has not been authorized as required by the FCC. This device is not and may not be offered for sale or lease until such FCC authorization is obtained. Thus, the user of this device may be required to return the device.”

V. Contact Information

Inquiries regarding this application should be directed to the following:

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