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Communications Engineering
and Economics

August 18, 2000

Mr. Douglas Young
Office of Engineering and Technology
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Dear Mr. Young:

This letter amends the application for a new experimental radio station authorization in New York, New York, filed by Mitsubishi Materials U.S.A. Corporation (FCC File No. 0057-EX-PL-2000.)

The following changes are requested:

1. Market studies will not be conducted. Mitsubishi Materials U.S.A. Corporation has determined that additional technical testing and demonstrations are required before conducting any market-related testing.

2. The Emission Designator is changed to 6K25G1W.

3. The Necessary Bandwidth is changed to 6.25 kHz.

4. There will a maximum of 12 base stations. (The present maximum of 20 mobile units is unchanged).

5. The maximum mean power (ERP) of the base stations will be 20 watts. The maximum mean power of the mobile units will be 2 watts.

6. The area of operation is changed to within 25 kilometers of the following reference coordinates (NAD 83 datum):

North Latitude	40	45	32
West Longitude	73	58	18

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7. The following 18 specific frequencies (9 frequency pairs) are requested, replacing the general bands of operation specified in the application (all frequencies in MHz):

Base Station	Mobile Station
454.043750	459.043750
454.050000	459.050000
454.056250	459.056250
453.993750	459.993750
454.300000	459.300000
454.306250	459.306250
454.318750	459.318750
454.325000	459.325000
454.331250	459.331250

Each group of three narrowband frequencies falls within a 20 kHz bandwidth channel of the Paging and Radiotelephone service (3 x 6.25 = 18.75 kHz). The corresponding six Paging and Radiotelephone channels are paired as follows: 454.050/459.050, 454.300/459.300, and 454.325/459.325 MHz (47 C.F.R. 22.561).

A search of active licenses using the Commission's Universal Licensing System shows no nearby operations that could potentially receive interference from the proposed experimental operation. For three 20 kHz channel pairs above, the following table shows the closest identified facilities:

Frequency (MHz)	Closest Active License and Location	Distance from Center of Operation (km)
454.050	KGA589 #8	181
459.050	KCC485 #2	157
454.300	KGI775 #11	134
459.300	KCC483 #8	286
454.325	KGI775 #11	134
459.325	KEC939 #2	135

That is the extent of the changes to the application. If there are any questions regarding the above, please let me know. Or, please contact counsel for Mitsubishi Materials U.S.A. Corporation:

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Sincerely yours,

Steven J. Crowley, P.E.

cc: Mr. Tsumoru Nagira
Jeffrey H. Olson, Esq.
Mr. Steven Symonds