

DESCRIPTION OF APPLICATION

As discussed with Mr. James Burtle, Chief of the Office of Engineering and Technology, Motorola, Inc., respectfully requests a new authorization that provides the same authority covered by an experimental authorization issued to Motorola, Inc., under call sign WE2XFT to accommodate the restructuring of Motorola, Inc., as described in greater detail below.

Experimental License – Background

In 1997, Motorola obtained a separate experimental license under call sign WE2XFT to conduct tests and demonstrations of equipment for export only at a limited number of locations using the frequency band 3300-3650 MHz. As explained in the narratives submitted in connection with the application materials for that license,¹ Motorola is actively involved in the research and development of hardware and software solutions associated with fourth generation (“4G”) cellular and wireless data communications systems that will meet the IEEE 802.16 standard. In particular, Motorola is researching the capabilities and functionality of adaptive antenna arrays (including their propagation modeling, predictive channel equalization, and beam forming characteristics) to increase channel capacity. The experimentation would yield benefits for the development of 4G wireless data and voice capabilities incorporated not only into consumer products, but also public safety, government, and military communications systems.

Thus, the authority granted under call sign WE2XFT and its two subsequent renewals have significantly enhanced Motorola’s ability to develop and evaluate innovative equipment needed to meet the communication requirements of its customers. Indeed, Motorola has successfully conducted a number of tests under the license and, notably, has not received a single complaint of interference about its tests from other licensees or operators.

Proposed Restructuring

Motorola is in the process of restructuring into two independent, publicly traded companies which will be owned initially by the then-current public shareholders of Motorola, Inc.² One company will be known as “Motorola Solutions, Inc,” reflecting

¹ See, e.g. “Narrative Statement,” Application for Modification of Experimental Radio License WE2XFT, ELS File No. 0056-EX-ML-2007 (filed Oct. 1, 2007).

² See generally Motorola Press Release, “Motorola Targets First Quarter 2011 to Separate into Two Independent, Publicly Traded Companies” (dated Feb 11, 2010), at <http://investor.motorola.com/separation.cfm> (visited 10/7/2010). The other company created as part of the restructuring is “Motorola Mobility, Inc.” Motorola Mobility now exists as a wholly-

only an administrative change in name from “Motorola, Inc.” Motorola Solutions will remain responsible for Motorola’s business activities addressing the communications requirements of the public safety and enterprise communities.

The Networks group (“Networks”) within Motorola currently oversees the development and marketing of commercial mobile radio network infrastructure equipment. Motorola Solutions has entered into an agreement to sell substantially all of the network infrastructure manufacturing assets to Nokia Siemens Networks B.V. (“Nokia Siemens”). The sale to Nokia Siemens is subject to a number of customary closing conditions. As such, while the sale and the restructuring are expected to occur within a short time of each other in 2011, the timing of consummation of the sale is uncertain at this time and may occur prior to or following the restructuring. If the sale occurs following the restructuring, Networks will remain in Motorola Solutions after the restructuring until consummation of the sale.

Request for “Cloned” License

By this application, Motorola respectfully requests a clone of call sign WE2XFT to be issued under a new call sign to Motorola, Inc. (Networks).³ The additional license is needed to ensure that each entity is independently authorized to conduct tests and demonstrations of prototype equipment and systems under its responsibility after the restructuring of Motorola is completed as well as to accommodate the expected assignment to Nokia Siemens. Motorola understands, though, that it must file a separate application on FCC Form 702 and obtain prior approval from the Commission before it may assign a cloned license to Nokia Siemens. At the appropriate time, Motorola will prepare and submit such additional applications.

owned subsidiary of Motorola, Inc. It is involved in the development and marketing of cable devices, including set-top boxes for use in homes, as well as wireless handsets and related devices for use on commercial mobile radio service systems, such as those that provide cellular and personal communications services. The current plan is for Motorola Mobility to be divested to the then-existing public shareholders of Motorola, Inc., after January 1, 2011.

³ Thus, the application for this new authorization is being submitted by Motorola, Inc., as the applicant but with the parenthetical “(Networks)” following the applicant’s name to aid in identifying this authorization as one intended to be associated with the Networks group within Motorola, Inc. The Networks group is not a separate corporate entity or subsidiary, however, as is the case with Motorola Mobility, Inc. This group will remain a part of Motorola, Inc. (to be renamed at a later date to Motorola Solutions, Inc.).

As a result of the grant of this application, the current license and the cloned license will be held as follows:

Licensee Name	Call Sign(s)	ELS File No.
Motorola, Inc. (to be renamed at a later date to “Motorola Solutions, Inc.”)	WE2XFT	0149-EX-RR-2009
Motorola, Inc. (Networks)	TBD	0471-EX-PL-2010

In addition, Motorola understands that any tests conducted under a cloned license would be subject to the identical technical specifications, conditions and requirements set forth in the existing license and in the narratives underlying the application for that license.⁴ It also understands that any operation under the duplicate license will be subject to the Communications Act of 1934, subsequent acts, and treaties, and all rules and regulations made by this Commission.

PUBLIC INTEREST STATEMENT

Motorola submits that grant of this application is in the public interest, as it will allow for the continued and uninterrupted development and manufacturing of innovative equipment needed to meet the communications requirements of public safety and commercial operators.

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⁴ To ensure the technical information in the applications are an exact duplicate of its existing license, Motorola selected the option available under the Experimental Licensing System (“ELS”) interface to “use[] information from an existing application (i.e. - a template)” and identified the file number associated with the latest renewal application for the authorization, ELS File No. 0145-EX-RR-2009.