

NARRATIVE STATEMENT

Pursuant to Sections 5.3, 5.51 and 5.61 of the Commission's rules, 47 C.F.R. §§ 5.3, 5.51 and 5.61 (2005), Motorola, Inc., respectfully requests a modification of its experimental license issued under call sign WD2XGD so that it may test and demonstrate prototype Advanced Wireless Service ("AWS") equipment operating in the 1710–1755 MHz band at a second location. The following information is provided in support of this request:

Purpose of Operation:

Motorola is actively involved in the research and development of hardware and software solutions associated with AWS communications systems. By this application, it seeks a modification of its authorization to test prototype equipment to be deployed at temporary fixed locations within 20 km of Libertyville, IL.

The proposed test will follow and supplement the research and demonstration performed by Motorola under its existing experimental license. *See generally* OET File No. 0227-EX-PL-2003 and 0190-EX-RR-2005. Specifically, the additional tests to be conducted under the modified authority requested by this application will allow it to demonstrate the functionality and capabilities of new wireless technologies to a key Motorola customer engaged in the business of providing telecommunications services so that that the customer may evaluate, and make an informed assessment of, the acceptability of AWS technologies. Motorola will not perform a market study under this experimental license, however. It will seek additional approvals if needed, to conduct such studies.

Motorola also recognizes that the operation of any equipment under experimental authority must not cause harmful interference to authorized facilities. It will therefore coordinate its activities with any relevant licensees in the proposed band in accordance with FCC requirements. Should interference occur, Motorola will take immediate steps to resolve the interference, including if necessary arranging for the discontinuance of operation.

Proposed Location:

Motorola proposes to install an AWS network comprised of not more than three temporary fixed sites within a 20 km radius of the location identified below in Libertyville, IL. Mobile devices will be operated within 20 km of each temporary fixed sites.

600 North US Highway 45
Libertyville, IL 60048
North Latitude: 42° 17' 22"
West Longitude; 87° 59' 57"
Datum: NAD83

Technical Specifications:

Application Type/Classification: XD

Frequency Band 1710–1755 MHz

Bandwidth / Emission Designators: 244KW7W, 244KGXW

As the modulation bandwidth is scaleable, other emission modes may be utilized, but in no event will the emissions extend beyond the frequency band requested. All power levels will comply with the limits set forth in the FCC's rules, including those relating to human exposure to radiation.

Power/Antenna Specifications:

Transmitters (Temporary Fixed Devices):

Maximum Transmitter Power Output: 100 watts transmitter. Motorola requires two temporary fixed transmitters at each location so that it may use one as a primary transmitter and the second as an interferor.

Mobile Devices:

Maximum Transmitter Power Output per Device: 4 watts

CISPR quasi-peak measurements are to be taken in the linear mode only.

Equipment To Be Used:

Motorola proposes to deploy only a limited number of units under this trial. It expects that it will be able to complete its experimentation and demonstration with a maximum of six temporary fixed transmitters (two at each of three temporary fixed locations) and 75 mobile units (25 mobile units in the vicinity of each temporary fixed location). Nevertheless, Motorola will limit the power, area of operation, and the transmitting times of these units to the minimum necessary to evaluate the technology.

Antenna / Antenna Structure Heights:

Motorola will comply with all FAA and FCC rules and regulations regarding the installation and operation of antennas. The antennas to be deployed under this authority will not extend more than six meters above the ground or, if mounted on an existing building or tower, will not extend more than six meters above the building or tower. If mounted on a tower, the antennas will not extend above the highest point (including appurtenances) of the tower. Within those limitations, DAPs will be installed less than 20 meters above ground level and the PCMCIA cards or other subscriber devices will operate not more than 2 meters above ground or floor level if in a building.

Restrictions on Operation:

Motorola understands that the FCC permits companies to conduct a number of activities without a license. For example: (1) companies may enter into agreements and contracts to manufacture products before they are approved; (2) manufacturers may sell—but not deliver—unapproved products on a conditional basis to wholesalers and retailers; and (3) entities may operate certain types of equipment to (a) test compliance; (b) demonstrate equipment at trade shows and other exhibitions with appropriate notices displayed; and (c) evaluate product performance and customer acceptability at the manufacturer's facilities or at certain non-residential sites during the developmental, design and pre-production stages. See Marketing Rule Revisions, § 2.803; Part 15 Revisions, 6 FCC Rcd 1683, 1685 (1991).

Notwithstanding these general rules, the FCC requires parties to seek authorization to use unapproved devices that will be operated at residential locations. Such authority may be granted under the FCC's experimental rules set forth in Part 5 of the Code of Federal Regulations, 47 C.F.R. Part 5 (2005), provided that: (1) participants are advised that the service or device is granted under experimental authority and is strictly temporary; and (2) the devices are owned by the licensee. Accordingly, this application seeks experimental authority to conduct experimental operations at residential locations as permitted under these rules.

Motorola does not propose to market, sell, or lease prototype equipment to end users or conduct a market study in conjunction with this test. Moreover, no fees will be charged to entities using the equipment during this test. After the experimentation ceases, Motorola will recall and recover all devices that do not comply with FCC regulations. If any different treatment becomes necessary during the course of its experimentation, Motorola will seek separate and additional authority from the agency.

Motorola also recognizes that the operation of any unapproved devices must not cause harmful interference to authorized facilities. It does not anticipate that such interference will occur, as the prototype equipment will operate at low power. Should interference occur, however, Motorola will immediately take reasonable steps to resolve the interference, including if necessary discontinuing operation. To that end, Motorola would advise entities using the equipment that permission to operate the equipment has been granted under experimental authority issued to Motorola, is strictly temporary and may be canceled at any time. For example, Motorola proposes to label the equipment or user information conspicuously as follows:

FCC STATEMENT

Permission to operate this device has been granted under experimental authority issued by the Federal Communications Commission to Motorola, Inc., is strictly temporary, and may be canceled at any time.

This device has not been authorized as required by the rules of the Federal Communications Commission. This device is not, and may not be, offered for sale or lease, or sold or leased, until authorization is obtained. Thus, the user does not hold a property right in the device and may be required to return the device.

Public Interest:

Motorola submits that issuance the requested modification is in the public interest, convenience, and necessity, as it will permit Motorola to develop innovative equipment that will accommodate the communications needs of its customers and, ultimately, their end-users and the public.

Contact Information:

Motorola Contact:

Tim Harrington
Lab - Systems Engineering
Motorola, Inc.
600 North US Highway 45
Libertyville, IL 60048

Telephone: 847.523.1571
Facsimile: 847.980.1730
Email: Tim.Harrington@motorola.com

Legal Contact:

Kurt DeSoto, Esq.
Wiley Rein LLP
1776 K Street, N.W.
Washington, DC 20006

Telephone: 202.719.7235
Facsimile: 202.719.7207
Email: kdesoto@wileyrein.com