

NARRATIVE STATEMENT

By this application, Motorola, Inc., seeks an experimental license to test and demonstrate prototype equipment for public safety use operating between 54-72 MHz, 76-88 MHz, 174-216 MHz, 470-806 MHz. Experimental activities will be conducted at various locations throughout the United States, as described below. The following information is provided in support of this request:

Purpose of Operation and Need for a 5-Year License:

Motorola proposes to test, demonstrate and operate prototype equipment for public safety use transmitting in the bands specified above. Motorola is a leading manufacturer of radio equipment and continually developing equipment for public safety use. It seeks to test and demonstrate this equipment during various stages of its research and design to evaluate functionality and acceptability prior to seeking equipment authorization. Grant of an experimental license will serve the public interest, necessity and convenience, as it will allow Motorola over the course of the license period to improve upon equipment used to meet public safety needs.

Proposed Locations:

Motorola proposes to conduct tests within 24 kilometers of its primary research and development sites at Schaumburg, Illinois; Redwood City, California; and Plantation, Florida. It also plans to test and demonstrate equipment at up to three other locations in the United States. Motorola does not know the precise locations of these three other sites at this time, however. Accordingly, it seeks a license that will permit it to conduct experimental operations nationwide (within the United States and its territories) so that it may have the flexibility to test at these sites once it determines the locations.

Specifically, Motorola proposes to conduct its experimental activities at the sites listed below as well as at three additional sites within the United States. Transmitters would be operated within 24 km of the locations, and mobiles would operate within 2 km of the base stations.

Schaumburg, Illinois North Latitude 42 deg 02' 39" West Longitude 88 deg 02' 36" Datum: NAD27	Redwood City, California North Latitude 37 deg 29' 19" West Longitude 122 deg 13' 04" Datum: NAD27	Plantation, Florida North Latitude 27 deg 08' 51" West Longitude 80 deg 15' 15" Datum: NAD27
--	---	---

Technical Specifications:

Frequency:	54-72 MHz, 76-88 MHz, 174-216 MHz, 470-806 MHz
Effective Radiated Power:	Base Stations: 10 Watts Peak Mobiles: 1 Watt Peak
Necessary Bandwidth:	Not greater than 6 MHz
Modulation:	Phase Modulation
Emissions:	130KD7W, 22K0F1D, 6M0G7F, 6M0F7F

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

Antenna Information:

The antennas will not extend more than 30 meters above the ground or, if mounted on an existing building, will not extend more than 6 meters above the building. If the antennas are mounted on an existing structure other than a building, they will be installed in accordance with FAA and FCC rules and regulations.

Equipment To Be Used:

The radio equipment under investigation is relatively low power compared to typical public safety radio communications equipment. Therefore, each mobile base station has a relatively small range. Motorola will need to use five different channels in the above mentioned bands simultaneously. In some cases, it will need to use two different channels.

To obtain accurate data regarding real-world operations, Motorola must employ a sufficient number of units during its studies to simulate actual usage. It expects that it will be able to complete its experimentation and demonstration with not more than 5 mobile base units and 15 mobile units per test location. In other words, 30 low power base stations and 90 mobiles reflect the maximum number of unapproved or unlicensed units that would be in operation at any given time at all of the six locations combined under the experimental license it requests. Moreover, Motorola will limit the power, area of operation, and transmitting times to the minimum necessary to evaluate the equipment. As required, Motorola would seek separate and specific authority if more units were needed to conduct a particular experiment.

Restrictions on Operation:

Motorola recognizes that the operation of any equipment under experimental authority must not cause harmful interference to authorized facilities. It therefore will coordinate its activities with any licensees in the proposed bands 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.

Motorola does not propose to market, sell, or lease any prototype equipment to end users. After the experimentation ceases, Motorola would recall and recover all devices that are not in compliance 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.

In addition, Motorola will advise entities using the equipment that permission to operate has been granted under experimental authority issued to Motorola, that such operation is strictly temporary, and that the equipment may not cause harmful interference. Motorola proposes to label the equipment or associated written information 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 cancelled at any time. Operation is subject to the condition that it not cause harmful interference. This device is not, and may not be, offered for sale or sold until the approval of the FCC has been 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 of a license is in the public interest, convenience, and necessity. Grant of a license will permit Motorola to develop innovative equipment that will accommodate the public safety communications needs of users.

Contact Information:

Motorola Contact:

Hemang Patel
Motorola, Inc.
1301 E. Algonquin Rd., MS 0509
Schaumburg, IL 60196
Telephone: (847) 435-9872
Fax: (847) 576-9018
hemang.patel@motorola.com

Legal Contacts:

David E. Hilliard, Esq.
Kurt E. DeSoto, Esq.
Wiley Rein & Fielding LLP
1776 K Street, N.W.
Washington, DC 20006
Telephone: (202) 719-7000
Fax: (202) 719-7049
dhilliard@wrf.com
kdesoto@wrf.com