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March 16, 2000

VIA HAND DELIVERY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Equipment Approval Services
P.O. Box 358320
Pittsburgh, PA 15251-5320

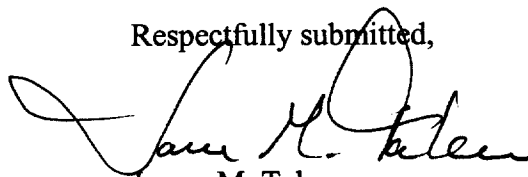
**Re: Motorola Inc.'s Request for Special Temporary Authority
to Conduct Path Connectivity Tests**

Dear Ms. Salas:

On behalf of Motorola, Inc. ("Motorola"), enclosed please find for filing an original and nine copies of Motorola's request for Special Temporary Authority to conduct radio path connectivity tests over the following frequencies: 25.3015-27.3015 GHz, 26.300-26.370 GHz, and 24.6-24.675 GHz.

Also enclosed is a check in the amount of \$45.00 for the applicable filing fee, a completed remittance advice form, FCC Form 159, and an additional copy, which we ask you to date stamp and return with our messenger.

Respectfully submitted,



James M. Talens
Counsel for Motorola, Inc.

Enclosures

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
)

Motorola, Inc.)

File No. _____

)
Application for Special Temporary)
Authority to Test Local Multi-Point)
Distribution System Two-Way)
Path Connectivity)
_____)

EXPEDITED CONSIDERATION REQUESTED

REQUEST FOR SPECIAL TEMPORARY AUTHORITY

Pursuant to Section 309(f) of the Communications Act of 1934, as amended,
47 U.S.C. § 309(f), Motorola, Inc. ("Motorola") hereby requests Special Temporary Authority
("STA") to conduct two-way Local Multi-Point Distribution System ("LMDS") connectivity tests
on the Motorola campus in Scottsdale, Arizona, over the following frequencies: 25.3015-27.3015
GHz, 26.300-26.370 GHz, and 24.6-24.675 GHz. Motorola seeks this STA for a period not to
exceed 90 days.

**I. GRANT OF MOTOROLA'S REQUEST FOR SPECIAL TEMPORARY
AUTHORITY WILL NOT CAUSE ANY HARMFUL INTERFERENCE TO
EXISTING USERS AND WILL SERVE THE PUBLIC INTEREST**

The Commission has a long-standing policy of granting Special Temporary Authority for
purposes of conducting tests where such authorization will not cause harmful interference and will
serve the public interest, convenience and necessity. *See, e.g., In the Matter of Newcomb*

Communications, Inc., Order and Authorization, 8 FCC Rcd. 3631, 3633 (1993); *In the Matter of Columbia Communications Corporation*, Order, 11 FCC Rcd. 8639, 8640 (1996); *In the Matter of American Telephone & Telegraph Company*, Order, 8 FCC Rcd. 8742, 8742 (1993). The requested authority to test LMDS equipment using the frequencies listed above will not cause harmful interference to any authorized user of the spectrum.¹ Moreover, grant of the instant STA request will serve the public interest by facilitating and expediting export of U.S.-manufactured radio equipment.

II. SECTION 304 WAIVER

In accordance with Section 304 of the Communications Act of 1934, 47 U.S.C. § 304, Motorola hereby waives any claim to the use of any particular frequency or of the electromagnetic spectrum because of the previous use of the same, whether by license or otherwise.

III. CONCLUSION

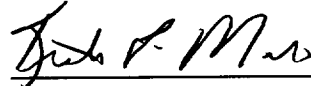
For the foregoing reasons, Motorola requests Special Temporary Authority to conduct radio experiments in Scottsdale, Arizona, over the following frequencies: 25.3015-27.3015 GHz, 26300-26.370 GHz, and 24.6-24.675 GHz – for a period of 90 days. Motorola respectfully requests Commission action on this request for renewal no later than March 24, 2000.

¹ Full technical information appears in Attachment A hereto.

Respectfully submitted,

Motorola, Inc.

By:



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Date: March 16, 2000

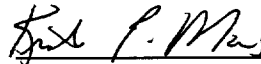
ANTI-DRUG ABUSE CERTIFICATION

Pursuant to section 1.2002 of the Commission's Rules, 47 C.F.R. § 1.2002 (1997), Applicant certifies that neither Applicant nor any of its shareholders, nor any of its officers or directors, nor any party to this Application are subject to a denial of Federal benefits pursuant to authority granted in Section 5301 of the Anti-Drug Abuse Act of 1988.

Respectfully submitted,

Motorola, Inc.

By:



Kristine P. Maine
Spectrum Staff Engineer
Motorola, Inc.
2501 South Price Road
Chandler, AZ 85248

Date: March 16, 2000

ATTACHMENT A

1. Frequencies

This STA request is to test a Local Multi-point Distribution System (LMDS) that implements two-way connectivity. The test system will consist of one hub transceiver and up to six customer premises transceivers to provide the connecting link between data modems. The hub transmitter will have a pilot center frequency of 26.3015 GHz and a bandwidth of 2 MHz. The downstream frequencies are in the 26.3025 to 26.3700 GHz band with a bandwidth of 6 MHz. Detailed operating parameters for each transmitter type are as follows:

Pilot

- (A) Frequency Range: Center frequency 26.3015 GHz; bandwidth of 2 MHz
- (B) Maximum RF Power: +17 dBm
- (C) Maximum EIRP: +33 dBm
- (D) Peak/Mean: All power levels are MEAN
- (E) Emission: 2M00F1W
- (F) Modulating Signal: Pilot: FM, 24,414 kHz at 1 MHz peak deviation
- (G) Necessary Bandwidth: 2 MHz

Downstream

- (A) Frequency Range: 26.300 GHz-26.370 GHz
- (B) Maximum RF Power: +17 dBm
- (C) Maximum EIRP: +33 dBm
- (D) Peak/Mean: All power levels are MEAN
- (E) Emission: 6M00D1W
- (F) Modulating Signal: continuous digital data using 64 QAM format, at 5 Mbaud/s
- (G) Necessary Bandwidth: 6 MHz

Upstream

- (A) Frequency Range: 24.6 GHz to 24.675 GHz
- (B) Maximum RF Power: +12 dBm
- (C) Maximum EIRP: +49 dBm
- (D) Peak/Mean: All power levels are MEAN
- (E) Emission: 1M60G1W
- (F) Modulating Signal: TDMA QPSK at 2.56 Mbaud/s
- (G) Necessary Bandwidth: 1.6 MHz

2. Location

The pilot, downstream, and upstream transmitters will be located on the Motorola campus bounded on the North by McDowell Road, on the South by Roosevelt Road, on the West by Hayden Road and on the East by Granite Reef Road in Scottsdale, Arizona. This represents a rectangle of approximately 25 square miles. The setup will be located on rooftops of Motorola employees' residences. The exact locations of those transmitters has not been determined at this time, but they will be within the specified area. A third location may be placed at N 33deg 25.615" (33° 25' 37" N) and W 111 deg 56.019 " (111° 56' 1.1" N).

3. Antennas

The transmitting equipment uses directional antennas.

Hub Antennas

Beam Width (3dB): 90 degrees, 10 degree elevation beamwidth. The antenna pattern azimuth coverage is +/-45 degrees off boresight. The antenna pattern elevation coverage is +/-5 degrees off boresight. The antenna will be oriented so as to aim the boresight in the vicinity of the transceiver antenna on the user's premises. It is likely that the Customer Premises Equipment transceiver antenna will be at the same height as the Hub antenna, so that the boresight elevation angle with respect to level will be zero.

Possible variants:

- a. Center of beam pointing North to a building within the boundaries of the Motorola campus described above.
- b. Center of beam pointing Southwest towards coordinates listed in section 2.

Customer Premises Antennas (2)]

Beam Width(3dB): 2.4 degrees using a parabolic dish.

Possible variants:

- a. Center of beam pointing South to a building within the boundaries of the Motorola campus described above.
- b. Center of beam pointing Northeast away from the coordinates listed in section 2.

4. Test Program

Test Objective

The objective of this test is to explore the feasibility of providing wideband data connectivity to very large numbers of individual subscribers using wireless interfaces operating in the 24-26 GHz frequency range. The continued growth in demand for data connectivity, specifically internet connectivity, will exceed the current limited capacity of telephone modems, particularly overseas

where telephone facilities are generally fewer per capita. Cable television systems which already have a large base of connected customers are beginning to use those systems to provide data connections at much higher speeds than telephone modems with good success. Telephone companies are also exploring new methods of using their existing wire facilities to provide wideband data service. A natural competitor to the wired system is the wireless system where connectivity is provided by an RF link. Frequency allocations in the vicinity of 30 GHz for this wireless service have already been made in anticipation of its viability. The requested STA will allow Motorola to establish a test system for the purpose of investigating wideband data connectivity that could potentially support consumers using wireless 24-26 GHz links. As a result of this investigation, Motorola expects to establish the requirements for modems, transceivers, system layout and system operating parameters. Motorola also expect to establish performance expectations and limits for the system. This information will be used in the development of equipment that will be sold to the commercial market for the purpose of providing a competing solution for wideband data connectivity, particularly overseas but in the United States as well.

Equipment Description

The equipment used under this STA will endeavor to duplicate the operational configuration of a cable data system. Data modems and system protocols are already established for the cable environment so they are a natural starting point for a wireless system investigation. By treating the cable modem's cable interface as the IF interface to a transceiver operating in the vicinity of 24-26 GHz, a system that significantly emulates that of a cable system can be achieved. That is the approach to be undertaken by the proposed system for which the STA is requested.

The test system will implement a limited wireless network consisting of a maximum of seven "users" who are linked to one central site or hub. The hub is the "head-end" which provides the gateway to the Internet. The connectivity achieved must provide each user with full time access to the Internet gateway.

The head-end equipment is Motorola's cable router, configured to provide one downstream channel and a maximum of four upstream channels. The downstream channel is the 30 Mbps channel from the headend to the customer premises equipment. It is time-shared among all of the users assigned to that channel. In this case, all seven users will be assigned to that channel. The upstream channel is the link from the customer equipment back to the hub site. This channel is also time shared among a few users.

The headend equipment sets up and manages the network. It generates the downstream channel that provides network synchronization and performance parameters to the customer equipment. Each customer premises modem responds to specific instructions in the downstream channel regarding its inbound channel, e.g., when to transmit, how much data is expected, etc. In this manner, the headend equipment can dynamically change channel assignments, transmit levels and control data flow to efficiently manage the network connections.

The interfaces to the headend equipment are 100BaseT (high-speed Ethernet protocol with data rates up to 100 Mbps) for interface to the Internet gateway and cable frequency IF interfaces to the transceiver equipment. The cable interface frequencies are 500 MHz to 570 MHz for the

downstream interface and 17 MHz to 42 MHz for the upstream. The cable IF interfaces connect directly to the hub transmitters and receivers.

Hub and user transceivers are experimental prototypes. The hub provides a fixed “upconversion” from the downstream cable IF frequency band to the 26.3-26.7 GHz band. The user transceiver provides fixed upconversion from the upstream cable IF frequency band to the 24.6-24.675 GHz band. The hub antenna is a 90 degree sector horn, Nurad p/n 092-00104. the user transceiver antenna is a parabolic dish, Nurad p/n 948-00322.