

NARRATIVE STATEMENT

Pursuant to Section 5.51 of the Commission's rules, 47 C.F.R. § 5.51 (2006), Motorola, Inc., respectfully requests a regular experimental license to test, evaluate and demonstrate a prototype radio communications system designed to support the communications requirements of government entities engaged in public safety and homeland security activities. Specifically, Motorola proposes to test a prototype system for a state government so that it may demonstrate the functionality and capability of the system, determine user acceptability, and obtain needed feedback to improve and enhance the design of the system. The experimental activities will be conducted on a non-interference basis using a limited number of non-Federal Government channels in the 150 MHz band that have already been pre-coordinated for such operation.

Grant of this application would serve to replace and supplement Motorola's existing special temporary authority ("STA") for this experimentation granted under File No. 0157-EX-ST-2007 and issued under call sign WD9XCB. Specifically, this application proposes to replace the STA authorizing experimental operations at various locations in the State of Wyoming.

As provided under Section 5.61(b) of the Commission's rules, 47 C.F.R. § 5.61(b)(2006), this application is also intended to serve as a continuance or extension of Motorola's authority to operate as permitted under its STA pending action on the application. Motorola understands that such continuance or extension applies only to the operations authorized and as conditioned under that STA and that it must wait action on this application for a regular license before it may operate in any manner or at any site proposed in this application that is at variance with operations authorized or conditioned under the STA. The regular license and extension are necessary to allow Motorola to continue its tests pending Commission action on applications filed by its customer for licenses under Part 90 and other FCC Rules.

Motorola does not seek authority to conduct market studies or provide communications services under the requested experimental authority. Nor does it propose to market, sell, or lease prototype equipment to end users in conjunction with this test. The participants in the test will be advised that operation is being conducted under an experimental authority issued to Motorola and is temporary. In addition, 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.

The following information is provided in support of this request:

Need for Experimental License:

Motorola seeks this license to meet the schedule established by the public safety user. The schedule was based on user and legislative expectations that Motorola could conduct the test pursuant to Section 2.803 of the FCC's rules under the state government's own authorizations. Those authorizations have not yet been issued, however, and the tests cannot be re-scheduled. Moreover, the STA is scheduled to expire on March 17, 2008.

Proposed Operations / Locations and Frequencies:

As noted above, Motorola requests authority to test, evaluate and demonstrate a prototype radio communications system designed to support the communications requirements of government entities engaged in public safety and homeland security activities. To obtain valid data and to present an accurate demonstration of real-world operations, Motorola must deploy a sufficient number of units during its test to simulate actual usage. Motorola expects that it will be able to complete its demonstration with approximately 10 to 20 mobile units or portables per transmitter site. Moreover, it will likely conduct tests at only three to five transmitter sites at a time. It will also limit the power, area of operation, and transmitting times to the minimum necessary to evaluate the system. Nevertheless, to ensure it has flexibility to test the system more expansively, if needed, Motorola seeks authority to deploy up to 260 mobile units or portables (or up to 20 mobiles/portables per proposed transmitter site).

The proposed locations of the base stations are identified in the table below in the counties of Albany, Carbon, Converse, Goshen, Natrona, Niobrara, and Platte, Wyoming. Mobile operations will occur within 80 kilometers of these locations. Motorola also seeks authority to relocate these sites at the request of the user to demonstrate the system at other sites, but in no event will the transmitters be located outside of the state of Wyoming or exceed the total number of transmitters or mobiles/portables specified above.

Operation under this experimental STA will be conducted on a non-interference basis on a limited number of 12.5 kHz channel pairs on non-Federal Government frequencies in the 150.8 – 157.0375 MHz band and 157.1875-162.0125 MHz band. Specifically, Motorola seeks to deploy approximately three to five, but not more than seven, channel pairs per site that have been recommended by the FCC's frequency coordinators or that are currently under review by the FCC for licensing to the state agency (*i.e.*, on selected channels unassigned to other licensees near each location). Moreover, as mentioned above, Motorola will limit the power, area of operation, and transmitting times to the minimum necessary to evaluate the system. Nevertheless, to ensure it has flexibility to test the system more expansively, if needed, Motorola has requested authorization to conduct tests on up to seven channel pairs and within these entire bands so that it may select other, non-Federal Government channels to avoid interference as necessary.

Technical Specifications:

Non-Federal Government Frequencies Only:	150.8 – 157.0375 MHz; 157.1875-162.0125 MHz
Base Station Power:	200 W Peak Effective Radiated Power (ERP) 100 W Transmitter Output Power (TPO) (all power levels will comply with the limits set forth in the FCC's rules, including those relating to human exposure to radiation)
Mobile Power:	100 W Peak ERP; 100 W TPO
Bandwidth:	12.5 kHz per Channel
Modulation:	Frequency Modulation
Emission Designators:	10K0F1D; 11K0F3E; 8K10F1E
Station Antenna:	Omnidirectional up to 9 dBi Gain
Mobile Antenna:	Omnidirectional up to 3 dBi Gain

Motorola also requests a waiver of the station identification requirements set forth in Section 5.115 of the Commission's rules, 47 C.F.R. § 5.115 (2006).

Antenna Information:

The antennas used for these tests will be installed and operated in accordance with all FAA and FCC rules and regulations.

Restrictions on Operation / Interference Protection:

Motorola recognizes that experimental operations must not cause harmful interference to authorized facilities. As stated above, operation under this experimental STA will occur only on a limited number of 12.5 kHz channel pairs on non-Federal Government channels allocated under the FCC's rules and that have pre-coordinated or applied for such use. Motorola will also coordinate with existing licensees, as necessary, but has selected and pre-coordinated channels that are not assigned in the test area or that are sufficiently distant so as not to pose interference concerns. Should interference occur, however, Motorola will take immediate steps to resolve the interference, including if necessary arranging for the discontinuance of operation.

In addition, Motorola will advise entities participating in the test that permission to operate has been granted under experimental authority issued to Motorola, that such operation is strictly temporary, and that the operation may not cause harmful interference. To that end, Motorola proposes to label prototype 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 Statement:

Motorola submits that issuance of experimental authority as requested is in the public interest, convenience, and necessity. Grant of such authority will permit Motorola to design and develop an innovative system that will accommodate the public safety and homeland security communications needs of users.

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Experimental Test Locations:

Site Name	Address	Latitude	Longitude
Pine Ridge	1 Mile East of 1-25 MP 100	42-20-46.9 N	105-02-11.9 W
Virgin Hill	East of Antelope Gap Road, 13 Miles East of Wheatland	42-02-36.7 N	104-41-48.3 W
Nine Mile Hill	9 Mile Hill Road, Southwest from Highway 287, North of Rawlins, WY	41-52-51.9 N	107-19-23.2 W
Divide Hill	2 Miles East of Hwy 789, 12 Miles South of Creston Junction	41-32-55.9 N	107-43-01.2 W
Shirley Mountain	5 Miles South of Shirley Basin Road, 26 Miles NW of Medicine Bow	42-09-51.8 N	106-34-36.8 W
77 Hill	Highway 270, 5 Miles North of Manville	42-50-39.9 N	104-37-01.9 W
Muddy Gap	West End, Red Hills, 3 Miles West of Muddy Gap	42-21-15.8 N	107-29-23.2 W
Morton Hill	Highland Loop Road, 11 Miles North of Douglas	42-54-36.5 N	105-19-49.6 W
Casper Mountain	Casper Mountain County Park, 7 Miles South of Casper	42-44-51.9 N	106-18-11.1 W
Casper POE	1771 North Salt Creek Highway, Mills	42-52-05.1 N	106-21-25.0 W
Waltman Hill	West of Gas Hill Road, 5 Miles SW of Waltman	43-02-13.9 N	107-17-19.2 W
Strouss Hill	1 Mile South of I-80, 26 Miles West of Laramie	41-29-17.8 N	106-03-00.0 W
Baggs Hill	1 Mile East of Highway 789, 3 Miles South of Baggs	41-00-20.9 N	107-37-18.8 W
Wyoming	At temporary fixed locations in the State of Wyoming (within 395 kilometers of the listed center coordinates, near Shoshoni, WY)	43-00-00.0 N	108-00-00.0 W