

NARRATIVE STATEMENT

Pursuant to Sections 5.1, 5.3, 5.51 and 5.53 of the Commission's rules, 47 C.F.R. §§ 5.1, 5.3, 5.51 and 5.53 (2008), Motorola, Inc. ("Motorola"), respectfully requests experimental authority beginning **July 13, 2009**, to test and demonstrate prototype devices under development for operation in the 2500-2700 MHz band. Operations will be limited to locations as listed below near Motorola's facilities in Schaumburg, Arlington Heights, and Palatine, Illinois.

A. Purpose of Operation:

Motorola is actively involved in the research and development of hardware and software solutions associated with communications systems that would operate in the 2500-2700 MHz band. In particular, Motorola is researching the capabilities and functionality of different antenna configurations (including their propagation modeling, predictive channel equalization, and beam forming characteristics) to increase spectrum capacity. Motorola's objective is to be able to offer a timely FCC-certified solution to the marketplace. The tests are intended to facilitate evaluation of the use of the band for various applications, as well as testing prototype solutions for the band.

Motorola will not perform a market study under this experimental license, however. Moreover, as discussed in greater detail below, Motorola does not propose to market, sell, or lease prototype equipment to end users. No fees will be charged to entities evaluating the equipment during this test. After the experimentation ceases, Motorola will recall and recover all devices.

B. Proposed Locations:

Motorola proposes to conduct experimental testing listed below within 1 km of the sites listed below. Mobiles will operate within a radius of 25 kilometers from the fixed sites.

Site Address	Coordinates (NAD 83)
1. Motorola Sector HQ, 1301 E. Algonquin Rd. Schaumburg, IL 60196	42° 04' 03" N // 88° 03' 05" W
2. Motorola Facilities, 1501 W. Shure Drive Arlington Heights, IL 60004	42° 08' 08" N // 87° 59' 56" W
3. Boeger Tower, 129 Boeger Rd. Arlington Heights, IL 60004	42° 08' 14" N // 87° 58' 57" W
4. Harris Bank, 800 E. Northwest Hwy Palatine, IL 60038	42° 06' 11" N // 88° 01' 24" W
5. Syverson Tower, 2301 N Rand Rd, Palatine, IL 60038	42° 09' 12" N // 88° 02' 11" W

C. Technical Specifications:

Frequency Band:	2500-2700 MHz
Modulation:	OFDM
Bandwidth/	
Emissions Designators:	20M0G7D, 20M0W7W, 20M0G2D, 20M0D7D. Motorola seeks to employ various modes of modulation and bandwidth. As the modulation bandwidth is scaleable, 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 relating to human exposure to radiation. The modulations are listed above, the bandwidth can range from 1.4 MHz to 20 MHz. To avoid interference, Motorola will comply with the measures described below under Section F, "Restrictions on Operation."

Antenna Data:	Motorola proposes to operate a maximum of five fixed sites. The following data include the maximum power levels associated with the proposed antenna configurations:
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Base Stations:	
Gain	14 dBi
ERP	125 W Peak; 5 W Average
Mobiles:	
Gain	4 dBi
ERP	0.6 W Peak; 0.25 W Average

D. Equipment To Be Used:

Motorola proposes to deploy a limited number of units. It expects that it will be able to complete its experimentation and demonstration with a maximum of 5 fixed sites and 200 mobiles. Initially, Motorola proposes to operate the base stations on a continuous basis. In the 4th quarter of 2009 and next year, sites would be operated continuously usually for periods of less than two weeks each. In addition, Motorola will limit the power, area of operation, and transmitting times of these units to the minimum necessary to evaluate the equipment.

E. 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, will not extend more than six meters above the building.

F. Restrictions on Operation:

Motorola understands that the FCC permits companies to conduct experimental tests without a license. For example, entities may operate certain types of equipment to: (1) test compliance; (2) demonstrate equipment at trade shows and other exhibitions with appropriate notices displayed; and (3) 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 policies, the FCC requires parties to seek authorization to use unapproved devices that will be operated in 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 (2008), 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, and it is coordinating this test with co-channel licensees operating within the potential reception range to avoid interference. Motorola does not anticipate that such interference will occur. Should interference occur, however, Motorola will take action immediately to resolve the interference, including if necessary discontinuing operation. It will use other channels under the same conditions specified in this request, if needed.

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.

G. Public Interest:

Motorola submits that issuance of a license 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.

H. Contact Information:

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