

NARRATIVE STATEMENT

By this application, Motorola, Inc., respectfully requests special temporary authority ("STA"), beginning **May 1, 2006**, to test, evaluate and demonstrate a prototype system for transmitting digital video signals in the 482-488 MHz, 488-494 MHz and 524-530 MHz bands to hand-held receivers incorporated into cellular telephones.

Purpose of Operation:

Pursuant to Sections 5.3(d) and (f) and 5.61 of the Commission's rules, 47 C.F.R. §§ 5.3(d) and (f) and 5.61 (2005), Motorola, Inc. hereby respectfully requests a special temporary authority ("STA") to demonstrate a prototype system for transmitting digital video signals to hand-held receivers incorporated into cellular telephones. Motorola proposes to conduct the demonstration commencing not later than May 1, 2006. This request builds upon Motorola's previous experimentation authorized under call sign WC9XIA, OET File No. 0628-EX-ST-2005, for which was granted October 20, 2005. Motorola has already initiated the coordination process for this test with the Society of Broadcast Engineers ("SBE").

Need for STA:

Motorola is a leading manufacturer of cellular telephones and is continually engaged in the design and development of a new and innovative communications equipment. The experimental authority requested herein will allow the company to test compliance and performance of the system, to demonstrate its operation and functionality to potential corporate purchasers and resellers, and to determine the system's acceptability.

Motorola requires special temporary authority so that it may demonstrate its system to industry analysts as well as to telecommunications providers, and other entities interested in incorporating digital video technology into their offerings or operations.

Grant of the STA will allow Motorola to demonstrate prototype equipment and obtain additional feedback so that it may enhance the company's efforts to design, develop and improve its equipment to meet the communications needs of telecommunications providers and users. No unapproved equipment will be offered for sale or lease, or will be sold or leased, inconsistent with FCC rules and regulations, however.

Location of Proposed Operation:

Motorola proposes to conduct its demonstration using a single base station transmitting at the location listed below. Mobile operations will be receive-only and will occur within 24 kilometers of each of the base station locations.

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

Equipment To Be Used:

One (1) Axcera 1305211 Modulator for DVB Transmitter
One (1) Axcera LU90ATC 90 Watt UHF DVB Transmitter with Mask Filter
Receive only mobiles

Type of Emission, Modulation Technique, and Bandwidth Required:

6 MHz DVB-H transmission (COFDM)

Emission Designator: 6M00F2W

The mean effective radiated power (ERP) is 61.0 watts.

The transmissions will utilize the digital video – handheld (“DVB-H”) modulation technique for a portable video technology intended to transmit video, audio and data to handheld devices. DVB-H modulation techniques differ from the 8-VSB modulation techniques employed for over-the-air digital television broadcasting.

The transmit channel emission designator is 6M00F2W, DVB-H COFDM. See Digital Video Broadcasting (DVB); Transmission System for Handheld Terminals (DVB-H), European Telecommunications Standards Institute EN 3020304 V1.1.1; November, 2004.

Other emission modes and modulation techniques may be utilized, but in no event will the emissions extend beyond the frequency bands requested. Moreover, Motorola 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 (2005).

Frequencies Desired:

Motorola respectfully requests authorization to operate in the bands 482-488 MHz (Channel 16), 488-494 MHz (Channel 17) and 524-530 MHz (Channel 23). It does not expect ultimately to develop equipment to operate in these bands, however. It eventually plans to develop equipment to operate in spectrum above that authorized for broadcast television. It has chosen this spectrum only because the equipment available for the demonstration is designed for use overseas where these bands are authorized for digital video transmissions.

Motorola has selected spectrum for this operation that it believes is unlikely to cause harmful interference to either broadcasting stations or to land mobile stations authorized in the 470-512 MHz portion of the UHF television band. More importantly, Motorola will coordinate with SBE and receive its approval before operating on any of these bands. Indeed, it has already contacted the SBE representative and initiated the coordination process on behalf of Motorola. It will also share its studies with the SBE local coordinator for the Chicago area.

By way of example, Motorola has conducted an interference analysis with respect to the proposed operations in the TV bands. The proposed station will be operated to confine out-of-channel emissions within the “simple” mask specified in Section 74.794 of the FCC’s rules, 47 C.F.R. § 74.794 (2005). This analysis will be based upon the Commission’s CDBS database information and an interference study per FCC OET Bulletin 69. Motorola will also study environmental considerations to ensure compliance with Section 1.1306 of the FCC’s rules, 47 C.F.R. § 1.1306 (2005), and, in particular, the human exposure requirements set forth in FCC OET Bulletin No. 65.

This analysis will ensure that there are no operational, full power co-channel or adjacent channel TV stations on the channels that Motorola seeks to use within the interference range of the proposed demonstration that require protection. The results of these analyses, which will show the co-channel and adjacent channel full power TV stations in relation to the proposed operation, will be shared with SBE representatives.

Moreover, operation under this experimental STA will occur only on a limited number of channels within the band. It is anticipated that only one or two such channel pairs will be used at each site.

Overall Height of Antenna(s) Above Ground:

The fixed base station transmitter antenna will be located at a height of 12.1 meters. The mobile antennas will not, under any circumstances, extend more than 6 meters above the ground. No antennas will be mounted in a fashion that will require approval under FAA and FCC rules and regulations.

Restrictions on Operation:

No unapproved equipment will be offered for sale or lease, or will be sold or leased, at the events inconsistent with FCC rules and regulations. Moreover, the transmissions are not intended for the general public, and the public will not be able to display or view the transmissions on conventional television receivers or cellular telephones. As such, the demonstration will not involve "broadcasting" as defined in Section 3 of the Communications Act, 47 U.S.C. § 153(5). Instead, the operations are designed to demonstrate a new mobile service intended to complement digital cellular telecommunications service provided to subscribers.

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 equipment under experimental authority must not cause harmful interference to authorized facilities. Should interference occur, Motorola will take immediate steps to resolve the interference, including if necessary arranging for the discontinuance of operation.

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 (FCC) 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 has not been authorized as required by the rules of the FCC. 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 Statement:

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 communications needs of users.

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