

NARRATIVE STATEMENT

Pursuant to Section 5.51 of the Commission's rules, 47 C.F.R. § 5.51 (2005), Motorola, Inc., respectfully requests a regular, two-year experimental license beginning September 1, 2006, to test, evaluate and demonstrate prototype systems designed to transmit digital video signals in the band 482-488 MHz (Channel 16) to handheld receivers incorporated into cellular telephones.

Grant of this application would serve to replace and supplement Motorola's existing special temporary authority ("STA") for this experimentation granted under File No. 0261-EX-ST-2006 and issued under call sign WC9XIA. Specifically, this application proposes to replace the STA authorizing experimental operations at Libertyville, IL. It also seeks authority to operate at two additional sites in the Chicago area near the Libertyville location (at Schaumburg and Arlington Heights, IL).

As provided under Section 5.61(b) of the Commission's rules, 47 C.F.R. § 5.61(b)(2005), this application is also intended to serve as a renewal or extension of Motorola's authority to operate as permitted under its STA pending action on this application. Motorola understands that such renewal or extension applies only to the operations at Libertyville, IL; it must wait action on the application for a regular license before it may operate at the additional sites.

The following information is provided in support of this request:

Purpose of Operation:

Motorola is a leading manufacturer of cellular telephones and associated devices and is continually engaged in the design and development of new and innovative communications equipment. The experimental authority requested herein will allow the company to: (1) test compliance and performance of the systems, (2) demonstrate their operation and functionality to potential corporate purchasers and resellers interested in incorporating digital video technology into their offerings or operations, and (3) determine the customer acceptability.

Grant of the license will also allow Motorola to obtain 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.

Locations of Proposed Operations:

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

Location No. 1:

Libertyville, IL

North Latitude: 42° 17' 22"

West Longitude: 87° 59' 57"

Datum: NAD83

Location No. 2:

Schaumburg, IL

North Latitude: 42° 03' 44"

West Longitude: 88° 03' 08"

Datum: NAD83

Location No. 3:

Arlington Heights, IL

North Latitude: 42° 07' 59"

West Longitude: 87° 59' 57"

Datum: NAD83

Equipment To Be Used:

Motorola proposes to deploy the following equipment at the above locations:

1. One (1) Axcera 1305211 DVB-H Modulator for DVB-T Transmitter (Each Location)
2. One (1) Axcera LU90ATC 90 Watt UHF DVB-T Transmitter with Stringent Mask Filter for channel 16 (At Location No. 1)
3. Two (2) Axcera LU50ATC 50 Watt UHF DVB-T Transmitter with Stringent Mask Filter for channel 16 (One each at Location Nos. 2 and 3)
4. Receive only mobiles (Each Location)

Type of Emission, Modulation Technique, and Bandwidth Required:

The transmissions will utilize the digital video transmission – 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.

The transmit channel emission designator for the proposed operations is 6M00F2W, DVB-H COFDM and the maximum mean effective radiated power as specified in the supplemental information provided below. 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 band 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 band 482-488 MHz (Channel 16). It does not expect ultimately to develop equipment to operate in this band, however. Motorola eventually plans to develop equipment to operate in spectrum authorized for such devices. It has chosen this spectrum only because the equipment available for the demonstration is designed for use overseas where this band is 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 its operations with the Society of Broadcast Engineers ("SBE") and will not operate on any other requested channels without SBE approval.

Indeed, Motorola has already contacted the SBE representative for the Chicago area and has initiated or obtained coordination on behalf of Motorola. Motorola shared with the representative its non-interference studies that show there are no operational, full power co-channel or adjacent channel TV stations that require protection on the channel that Motorola seeks to use within the interference range of the proposed test locations. The analysis was based upon the Commission's Broadcast Radio and Television Electronic Filing System ("CDBS") database information and interference studies per FCC OET Bulletin 69. These studies also demonstrate that the proposed stations will be operated to confine out-of-channel emissions within the "stringent" mask specified in Section 74.794 of the FCC's rules, 47 C.F.R. § 74.794 (2005). In addition, the antennas at Location Nos. 2 and 3 will operate with the null directed toward Chicago.

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.

Overall Height of Antenna(s) Above Ground:

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

Restrictions on Operation:

Motorola will comply with all FCC rules and regulations governing the marketing and operation of unapproved radiofrequency devices prior to obtaining any needed equipment authorizations. See *generally* 47 C.F.R. § 2.803 (2005). For example, no unapproved equipment will be offered for sale or lease, or will be sold or leased, to end users inconsistent with the FCC's rules. Nor will Motorola conduct a market study in conjunction with these tests inconsistent with FCC rules. 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. If any different treatment becomes necessary during the course of its experimentation, Motorola will seek separate and additional authority from the agency.

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.

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.

As an additional safeguard, 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. To that end, 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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Supplemental Technical Information for FCC Staff

Location No. 1: NAD83: 42 17' 22" Lat 87 59' 57" Long (Libertyville, IL)
Location No. 2: NAD83: 42 03' 44" Lat 88 03' 08" Long (Schaumburg, IL)
Location No. 3: NAD83: 42 07' 59" Lat 87 59' 57" Long (Arlington Heights, IL)

1. Channel number(s).

Channel 16 (482-488 MHz);

2. Antenna location site elevation above mean sea level in meters.

Location No. 1: 768 m
Location No. 2: 224 m
Location No. 3: 225 m

3. Overall tower height above ground level in meters.

Location No. 1: 15 m
Location No. 2: 50 m
Location No. 3: 15 m

4. Height of radiation center above ground level in meters.

Location No. 1: 12 m
Location No. 2: 52 m
Location No. 3: 17 m

5. Maximum effective radiated power in kilowatts.

Location No. 1:	0.061 kilowatts, measured during the active transmitter period (no time averaging during inactive periods of emissions).
Location No. 2:	0.1 kilowatts, measured during the active transmitter period (no time averaging during inactive periods of emissions) with the null directed toward Chicago.
Location No. 3:	0.1 kilowatts, measured during the active transmitter period (no time averaging during inactive periods of emissions) with the null directed toward Chicago.

6. Transmitter output power in kilowatts.

Location No. 1: 0.090 kilowatts, line losses from transmitter to antenna and peak antenna gain account for a factor of 0.46 dB

Location No. 2: 0.033 kilowatts, line losses from transmitter to antenna and peak antenna gain account for a factor of 4.8 dB

Location No. 3: 0.033 kilowatts, line losses from transmitter to antenna and peak antenna gain account for a factor of 4.8 dB

7. Verify that the antennas are non-directional.

Location No. 1: The antenna is omni-directional.

Loc. Nos. 2 and 3: The antennas are directional; the radiating elements of the antenna will be configured such that there is at least a 0 dB null toward downtown Chicago.

8. If the emissions are digital, then report the out-of-band emission mask (simple or stringent).

Stringent mask

9. If the emissions are analog, then report the frequency offset (zero, plus, minus or none).

N/A. Emissions are digital.