

EXHIBIT A

NARRATIVE STATEMENT

Pursuant to Section 5.3(d) and (f) and Section 5.61 of the Commission's rules, 47 C.F.R. §§ 5.3(d), (f), 5.61 (2009), Motorola, Inc., hereby respectfully requests special temporary authority ("STA") from **July 30 to August 6, 2010**, to operate in the 758-768/788-798 MHz band for the purpose of demonstrating prototype broadband Long-Term Evolution ("LTE") devices at the APCO Annual Conference and Expo to be held in the George R. Brown Convention Center in Houston, Texas.

Attached for the staff's reference is a letter of concurrence from the Public Safety Spectrum Trust ("PSST") for the proposed operation on its portion of the spectrum.

A request for expedited treatment is being filed concurrently with this request under a separate exhibit.

A. Purpose of Operation and Need for STA:

Motorola is a leading manufacturer of mobile radio equipment for the public safety and homeland security community 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 demonstrate the performance and functionality of prototype devices designed to support the needs of the public safety and homeland security community.

Specifically, Motorola proposes to conduct demonstrations of prototype equipment at the APCO Annual Conference and Expo to be held August 1-4, 2010, in the George R. Brown Convention Center in Houston, Texas. To accommodate set-up requirements as well as requests from public safety agencies to conduct post-conference demonstrations, Motorola respectfully requests that the FCC grant the STA for the period July 30 through August 6, 2010.

Grant of an STA will allow Motorola to demonstrate prototype equipment and obtain additional feedback during the APCO Annual Convention and Expo so that it may enhance the company's efforts to design, develop and improve its equipment to meet the communications needs of potential users.

B. Location of Proposed Operation:

Motorola proposes to conduct its demonstrations using a single fixed base station transmitter antenna located inside the George R. Brown Convention Center communicating with mobile/portable units operating within a radius of 150 meters from the fixed base station. The address and approximate coordinates of the Convention Center are:

George R. Brown Convention Center
1001 Avenida De Las Americas
Houston, TX 77010-6099
29° 45' 3.4" North Latitude
95° 21' 32.2" West Longitude
Datum: NAD83

C. Technical Specifications:

1. Frequencies Desired

Motorola requests authorization to operate in the band 758-768/788-798 MHz. This band encompasses both the 758-763/788-793 MHz band known as the upper 700 MHz D block, which has not yet been licensed for regular operation, and the 763-768/793-798 MHz public safety block licensed on a nationwide basis to the Public Safety Spectrum Trust ("PSST").

2. Effective Radiated Power

All power levels will comply with the limits set forth in the FCC's rules, including those relating to human exposure to radiation.

The mobile/portable units to be deployed are configured to operate at an average power level of 250 mW effective radiated power ("ERP") and a peak power level of 2.5 Watts ERP. The base station will be configured to operate at an average power level of 400 mW ERP and a peak power level of 10 Watts ERP.

Motorola will reduce the actual powers to the minimum power needed for successful operation, based on set-up and testing at the George R. Brown Convention Center site.

In addition, Motorola will evaluate environmental considerations to ensure compliance with Section 1.1306 of the FCC's rules, 47 C.F.R. § 1.1306 (2009), and, in particular, the human exposure requirements set forth in FCC OET Bulletin No. 65.

3. Modulation and Emissions

Motorola proposes to operate using OFDM modulation. The primary emission designators are 5M0G7D, 5M0W7W, 5M0G2D, 5M0D7D, 10M0G7D, 10M0W7W, 10M0G2D, and 10M0D7D. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequency bands requested.

4. Antenna Information

The fixed base station transmitter antenna will be located inside the George R. Brown Convention Center in Houston, Texas at a height no greater than 20 feet above the floor. The mobile/portable antennas will not, under any circumstances, extend more than 6 meters above ground. No antennas will be mounted in a fashion that will require approval under FAA and FCC rules and regulations.

5. Equipment To Be Used

Motorola expects that it will be able to conduct its demonstration with a single base unit and up to five mobile/portable units. Moreover, Motorola will limit the power, area of operation, and transmitting times to the minimum necessary to evaluate the equipment.

D. Protection Against Causing Interference:

As noted above, Motorola has requested authority to operate in the 758-768/788-798 MHz band. This band encompasses both the 758-763/788-793 MHz band known as the upper 700 MHz D block, which has not yet been licensed for regular operation, and the 763-768/793-798 MHz public safety block licensed on a nationwide basis to the Public Safety Spectrum Trust ("PSST"). A letter of concurrence from the PSST is attached for the requested operation on its portion of the spectrum. No concurrence is necessary or possible on the D block portion because there is no regular licensee of that spectrum.

Motorola also searched the Commission TV database to determine what if any licensed Low Power TV stations are in the area. The closest co-channel licensed LPTV station is K63HF, licensed to Windsong Communications, Inc, on channel 63 in Lake Charles, LA, approximately 131.6 miles from the George R. Brown Convention Center. That station's 74 dBu coverage contour extends approximately 15 miles from the transmitter site. Therefore, a 116 mile buffer exists between Motorola's proposed transmitter site and the closest possible receiver within the coverage contour of Station K63HF. The closest adjacent channel licensed (STA) LPTV station is KCTL-LP, licensed to International Broadcasting Network, on channel 66 in Livingston, TX, approximately 69.7 miles from the George R. Brown Convention Center. That station's 74 dBu coverage contour extends approximately 15 miles from the transmitter site. Therefore, a 54 mile buffer exists between Motorola's proposed transmitter site and the closest possible receiver within the coverage contour of Station KCTL-LP. There is also a pending application on file at the FCC seeking

authority to operate an LPTV site on channel 62 approximately 83.6 miles from the Convention Center, but Motorola was unable to find any record in the FCC's database that a construction permit or license has been issued in connection with that application. No licensed Broadcast Auxiliary stations were found within 150 miles of George R. Brown Convention Center.

Motorola also conducted a search of the Commission's Universal Licensing System ("ULS") database, and it found no active public safety licenses authorizing operation in the Houston area on frequencies which are co-channel to those proposed in this STA request. Although the Harris County holds licenses in the 700 MHz band, it is authorized to operate within the 769-775/799-805 MHz narrowband 700 MHz spectrum block, *i.e.*, outside of the spectrum requested in this STA request. Similarly, the State of Texas holds a license for the designated state channels within the 769-775/799-805 MHz narrowband 700 MHz spectrum block, but these channels, too, are outside the spectrum Motorola has requested in this application. Moreover, the State of Texas is not listed as a licensee operating under the previous bandplan, so its operations must conform to the current 700 MHz bandplan and, therefore, should not be affected by Motorola's proposed operation.

Furthermore, as noted above, the length of the demonstration period is short, extending only from July 30 through August 6, 2010.

E. Restrictions on Operation:

Motorola is not seeking authority to perform a market study under this STA. Moreover, no fees will be charged to entities using the equipment during this test. After the test is completed, Motorola will recall and recover all devices that do not comply with FCC regulations.

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. Entities will also be advised in accordance with Section 2.803 of the Commission's rules, 47 C.F.R. §2.803 (2009), that any unapproved devices have not been authorized as required by the rules of the FCC and are not being offered for sale or lease, or sold or leased, until authorization is obtained.

F. Public Interest:

Motorola submits that issuance of an STA as requested is in the public interest, convenience, and necessity. Grant of an STA will permit Motorola to develop innovative equipment that will accommodate the communications needs of the public safety and homeland security community.

G. Contact Information:

For questions about this application, please contact:

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In the unlikely event interference concerns should arise during the period of authorization for this STA, please contact:

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July 9, 2010

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

Re: Application of Motorola for Temporary Spectrum Use

Dear Ms. Dortch:

The Public Safety Spectrum Trust ("PSST") hereby provides its consent to Motorola's application for experimental special temporary authority ("Experimental STA") regarding its proposed temporary operation in the PSST's 700 MHz band spectrum to demonstrate Long Term Evolution ("LTE") equipment at the 2010 APCO International Annual Conference. The PSST understands that the demo operation planned would conform to the following parameters:

- 1) Operation will be confined to the immediate vicinity of the George R. Brown Convention Center in Houston, Texas. Equipment would include a base station and associated antenna located inside the Convention Center, along with a small number of portable units operating at no more than 500 feet from the base site.
- 2) Motorola will request authority from the FCC to operate over the 758-768/788-798 MHz band. This encompasses both the 763-768/793-798 MHz bands, which are currently licensed on a nationwide basis to the PSST as part of the 700 MHz Public Safety Broadband License, and the 758-763/788-793 MHz bands known as the Upper 700 MHz D Block, which has not yet been licensed for regular operation.
- 3) Operation will occur between July 30 and August 6, 2010, allowing time during that period for setup and testing, demonstrations, and teardown.

We understand that Motorola has analyzed information from the FCC's license databases and has determined that the proposed operation would not interfere or create a significant potential for interference with any public safety operations in the 700 MHz band. Specifically, Motorola has told us they found no active public safety licenses authorizing operation in the Houston area on frequencies which are co-channel to those proposed in the STA request. Although Harris County holds licenses in

the 700 MHz band, it is authorized to operate only within the 769-775/799-805 MHz public safety narrowband spectrum block, i.e., outside of the spectrum bands that Motorola is requesting in its STA application. Motorola did not find any 700 MHz licenses for the City of Houston and confirmed with Tom Sorley, Houston's Deputy Director of Radio Communications Services, that Houston does not yet have 700 MHz licenses. The State of Texas holds a license for the designated state channels within the 769-775/799-805 MHz public safety narrowband spectrum block, but these channels are also outside the spectrum bands that Motorola is requesting in its STA application. Moreover, the State of Texas is not certified as a licensee operating under the previous bandplan as the FCC required when the bandplan was revised. Therefore, any operation on the state channels would also be outside the bands requested for the Motorola demonstration.

Given the above information, the PSST concurs with Motorola's proposed operation on certain frequencies currently licensed to the PSST as part of the 700 MHz Public Safety Broadband License for purposes of demonstrating LTE equipment at the APCO Conference. As you are aware, decisions on the permanent use of the adjacent Upper 700 MHz D Block spectrum are still pending at the FCC. The PSST takes no position as to Motorola's request regarding use of the D Block spectrum. This consent is subject to the PSST's ongoing ability to monitor any operations and use of the PSST's licensed spectrum.

Respectfully submitted,



Chief Harlin R. McEwen
Chairman
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