

Request for Expedited Treatment

Motorola respectfully requests expedited treatment of its application for special temporary authority (“STA”) submitted under the above-referenced file number so that it may commence experimental operations beginning on July 31. It regrets any inconvenience caused by the submission of this request on short notice. Motorola staff was required to wait for necessary information regarding the location and technical specifications of the testing and development under the STA before it could complete and submit the application. Nevertheless, it has now implemented procedures to ensure that similar, related requests are filed not less than 30 days before any scheduled test. It has also advised persons responsible for obtaining FCC authority about this requirement.

As stated in the accompanying narrative, Motorola seeks to test, evaluate and demonstrate low voltage broadband over power line (“BPL”) prototype equipment operating in the 4 to 21 MHz band at a limited number of residential and locations. The test is scheduled to commence on July 31 so that Motorola may meet its commitments with entities seeking to evaluate the performance and acceptability of equipment designed, among other things, to support broadband communications capabilities in underserved areas, including rural and insular areas. The test will also allow Motorola to evaluate prototype equipment before such equipment is certified or verified for unconditional sale, as required by Section 2.803 of the Commission’s rules, 47 C.F.R. § 2.803 (2004). Specifically, it must test performance, capacity, signal quality, and data rates of such equipment to identify and make needed enhancements to ensure its products comply with company and agency standards before Motorola seeks FCC approvals for the equipment.

Motorola must commence testing and data collection on schedule to avoid subsequent delays in finalizing development and FCC equipment certification. Given the need to implement alternative and robust communications capabilities as quickly as possible, a delay in testing could jeopardize the provision of communications capabilities that the installation of new and innovative equipment developed by Motorola, once approved, would support. For example, entities engaged in public safety activities require immediate, reliable, and ubiquitous communications capabilities in order to perform their responsibilities effectively. Delays in communications could result in injuries to the public and damage to property. Thus, a grant of the requested application would clearly be in the “public interest.”