

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 **October 22 to October 28, 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 International Association Chiefs of Police ("IACP") Annual Conference to be held in the Orange County Convention Center in Orlando, Florida.

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. 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 IACP Annual Conference to be held October 23-27, 2010, in the Orange County Convention Center in Orlando, Florida. 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 October 22, 2010 through October 28, 2010.

Grant of an STA will allow Motorola to demonstrate prototype equipment and obtain additional feedback during the IACP Annual Convention 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 Orange County 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:

Orange County Convention Center
9860 Universal Boulevard,
Orlando, Florida 32819-8706
28° 25' 25.57" North Latitude
81° 28' 06.65" West Longitude

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 Orange County 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 Orange County Convention Center in Orlando, Florida 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 has been requested from the PSST regarding operation on its portion of the spectrum. That concurrence will be provided when received. 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 W56EB (TX LIC CH56, LD CP CH31), licensed to Enlace Christian TV, operating under temporary authorization on channel 68 approximately 10 miles southeast of Tampa, Florida, approximately 64 miles from the Orange County Convention Center. That station's 74 dBu directional coverage contour extends approximately 20 miles from the transmitter site pointed to the northwest covering Tampa metro area. Therefore, a 50 mile buffer exists between Motorola's proposed transmitter site and the closest possible receiver within the coverage contour of Station W56EB. The next closest co-channel licensed LPTV station is W63DB (LD CP CH18), licensed to Equity Media Holdings, operating on channel 63 approximately 10 miles north of Williston, Florida, approximately 90 miles from the Orange County Convention Center. That station's 74 dBu coverage contour extends approximately

20 miles from the transmitter site. Therefore, a 70 mile buffer exists between Motorola's proposed transmitter site and the closest possible receiver within the coverage contour of Station W63DB. There are no other licensed or pending applications for co-channel or adjacent channel LPTV stations within 120 miles of the Orange County Convention Center.

No licensed Broadcast Auxiliary stations were found within 200 miles of Orange County 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 Orlando area on frequencies which are co-channel to those proposed in this STA request. Although Orange County and nearby Lake County hold licenses in the 700 MHz band, they are 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 Florida 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 Florida 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 October 22 through October 28, 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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September 20, 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 Corporation ("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 IACP Annual Conference in October, 2010, as described in more detail below. The PSST understands that the demonstration operation planned would conform to the following parameters:

- 1) Operation will be confined to the immediate vicinity of the Orange County Convention Center in Orlando, Florida. Equipment would include a base station and associated antennae located inside the Convention Center, along with a small number of portable units operating at no more than 150 meters from the base site.
- 2) Motorola will request authority from the FCC to operate over the 758-768/788-798 MHz bands. 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 October 22 and October 28, 2010, allowing time during that period for setup and testing, demonstrations, and teardown.
- 4) 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. Motorola has also told us that they found no active public safety

licenses authorized to operate in the Orlando area on frequencies which are co-channel to those proposed in the STA request.

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 IACP Annual 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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