

November 12, 2009

TO: FCC OET

FROM: Thomas Rubinstein

SUBJECT: Requested Frequencies

In performing our test program, we will need to use frequencies near the low end, middle, and high end of the two frequency bands our antennas are designed for. Because uncertainty of interference, we are, in some cases, requesting multiple frequencies so that we can re-locate to avoid interfering with or being interfered-with by other stations. We discuss some of our frequency selections below:

144.1 to 148 MHz

We have requested nearly the entire 144–148 MHz amateur band. Our intention is to use only one channel but, because amateur operations are not predictable and we need an interference-free environment for our tests, we have requested maximum flexibility.

156.040, 156.180, and 156.260 MHz

We have requested three frequencies near 156 MHz. According to a frequency search we performed, these frequencies are all offset by at least 15 kHz from any existing users within 40 km of the proposed test location. Since our test signals are only 500 mW at a height of 1.5m, and (other than station identification) will be unmodulated, we do not expect to interfere with any nearby licensees.

174.0125 MHz

This frequency lies just inside television channel 7. According to the FCC TVQ database, the nearest channel 7 broadcaster is 116 miles away in Bangor, Maine. Since that station's service contour extends approximately 50 miles in the direction of our proposed test location, our location is approximately 66 miles outside the service contour. Given that and the low power (500 mW) and low antenna height (1.5 m), we do not expect to interfere with any television receivers seeking to receive that station.

764.0125 and 805.9875 MHz

These frequencies are in the proposed Public Safety 700 MHz band. A search of the FCC ULS database revealed that there are no licensees on either proposed frequency within 200 km of the proposed test location. Given that the units to be tested are intended for use by Public Safety, they must be tested on Public Safety frequencies.

868.9875 MHz

We have contacted the sole licensee of this frequency in this area and have received assurances that they will not be migrating to this frequency during our intended test period and that they have no objection to our operation prior to their migration. Should the Commission require written confirmation of this fact, we will obtain it.