

S-3421-EX-1998

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June 9, 1998

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Federal Communications Commission
Experimental Radio Services
P.O. Box 358320
Pittsburgh, PA 15251-5320

Re: Motorola, Inc.
Request for a Special Temporary Authorization

To the Commission:

On behalf of Motorola, Inc., transmitted herewith is a request for a Special Temporary Authorization to conduct experimental operations.

Please note that Motorola currently has a pending application on file at the Commission for a regular Experimental Radio license for the proposed experimentation. See File No. 6150-EX-PL-1998. In that application, Motorola requested authority to begin its experimental operations by June 1, 1998. The agency has not yet been able to act on that application, however. Accordingly, Motorola seeks an STA so that it may commence its experimental operations pending action on that application. It respectfully requests such authority by June 22, 1998.

Also enclosed is a check for \$45.00 to cover the filing fee (Fee Type Code "EAE"), along with a completed Form 159.

Should you have questions concerning this matter, please call me at (202) 429-7235 or our engineering consultant Tom Dombrowsky at (202) 429-7236.

Respectfully submitted,



Kurt E. DeSoto
Counsel for Motorola, Inc.

Enclosures

cc: Mr. Doug Young

Motorola, Inc.
50 E. Commerce Drive, Suite M1
Schaumburg, IL 60173
Telephone: (847) 538-5200

Federal Communications Commission
Experimental Radio Services
P.O. Box 358320
Pittsburgh, PA 15251-5320

Re: Request for a Special Temporary Authorization

To the Commission:

Motorola, Inc., hereby requests Special Temporary Authorization ("STA"), beginning June 22, 1998, to test a wireless cable networking system, as described below.

In accordance with Section 5.56 of the Commission's Rules, the following information is provided in support of this request:

1) Name and Address of the Applicant:

Motorola, Inc.
50 E. Commerce Drive, Suite M1
Schaumburg, IL 60173
Telephone: (847) 538-5200

Technical Contact:

Dennis E. Burke
Senior Staff Engineer
Motorola, Inc.
50 E. Commerce Drive, Suite M1
Schaumburg, IL 60173
Telephone: (847) 576-9919

*OK w/ HFW. No govt.
licenses in area.
JBY
6/16/98*

2) Need for Special Action:

Motorola currently has a pending application on file at the Commission for a regular Experimental Radio license for the proposed experimentation. See File No. 6150-EX-PL-1998. In that application, Motorola requested authority to begin its experimental operations by June 1, 1998. The agency has not yet been able to act on that application, however. Accordingly, Motorola seeks an STA so that it may commence its experimental operations pending action on that application. It respectfully requests such authority by June 22, 1998.

3) **Type of Operation:**

Intermittent.

4) **Purpose of Operation:**

To test wireless cable networking via radio downconverter/upconverter interface (i.e., transverter) to HFC/Cable Data modem end-station products and a related transverter arrangement at the Cable Data router. The experimentation would allow Motorola to determine the required frequency stability limits of the proposed transverters and any equalizer requirements of the HFC/Cable Data modem end-stations (due to path link variances), so as to support wireless cable data networking.

5) **Dates of Operation:**

June 22, 1998, to December 22, 1998.

6) **Class of Station:**

Experimental.

7) **Location of Operation:**

The base stations will be located at the following sites:

1303 East Algonquin Road
Schaumburg, Cook County, IL
44-03-44 N, 88-03-09 W

50 E. Commerce Drive
Schaumburg, Cook County, IL
42-03-52 N, 88-04-40 W

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Subscriber units will operate within 80 kilometers of the base stations.

8) **Equipment to be Used:**

To obtain accurate data, Motorola must employ a sufficient number of units during its studies to simulate actual usage. It expects that it will be able to complete such studies with a maximum of 2 base units and 200 subscriber units per product generation. The base units will be installed at the two locations identified above and will operate at 2 kW ERP. The subscriber units will be installed in business and residential environments within 80 kilometers of the base units and will operate on an intermittent basis using directional antennas at 100 watts ERP.

These numbers are intended to reflect the maximum numbers of unapproved units that will be in operation at any given time. In other words, before Motorola begins to experiment on a new product, it generally will have obtained approval for certain existing products under experimentation or it will have recalled those products and ceased operation. As required, Motorola would seek separate and specific authority if more units are needed to conduct a particular study.

Motorola recognizes that the operation of any unapproved device under experimentation must not cause harmful interference to authorized facilities. It therefore will coordinate its activities with all licensed users in the proposed bands. Should interference occur, Motorola will take reasonable steps to resolve the interference, including if necessary arranging for the discontinuance of operation.

In addition, Motorola would advise entities receiving the equipment that permission to operate the equipment has been granted under experimental authority issued to Motorola, that such operation is strictly temporary, and that the equipment may not cause harmful interference. Accordingly, Motorola proposes to label the equipment or user information as follows:

FCC STATEMENT

Permission to operate this device has been granted under experimental authority issued by the Federal Communications Commission 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 approved by the FCC and is not, and may not be, offered for sale or sold until the approval of the FCC has been obtained. Thus, the user does not hold a property right in the device and may be required to return the device.

9) Frequencies Desired:

2305-2320 MHz
2345-2360 MHz

10) Maximum Power:

The base stations will operate at a power output not greater than 100 W and an ERP not greater than 2 kW. The mobile units will operate at an ERP not greater than 100 W.

11) Type of Emission:

The primary emission designator will be 06M0D1D. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequencies set forth under Item 9.

12) Overall Heights of Antennas Above Ground:

Motorola will comply with all FCC and FAA antenna requirements. The antennas will be mounted either: (1) not higher than 20 feet above ground or 20 feet above a building; (2) on an FAA-approved structure in a manner that will not exceed the approved height (e.g., side mounted below the approved height); or (3) in a manner that does not require FAA approval.

13) 47 C.F.R. § 1.2002 Certification:

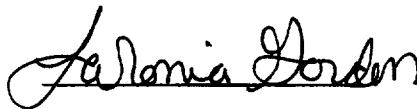
Applicant hereby certifies that it, its officers and directors, and any party with five percent or greater interest in this request for special temporary authorization is not subject to a denial of the Federal benefits requested herein pursuant to Section 5301 of the Anti Drug Abuse Act of 1988, 21 U.S.C. § 862.

Motorola submits that issuance of an STA is in the public interest, convenience, and necessity as it will permit Motorola to simulate real-world operation of its services. As such, Motorola will be able to ensure its products are designed to accommodate consumer needs.

Enclosed is a check for \$45.00 to cover the filing fee (Fee Type Code "EAE"), along with a completed Form 159.

Should you have questions, please call our FCC counsel Kurt E. DeSoto or engineering consultant Tom Dombrowsky of Wiley, Rein & Fielding at (202) 429-7000.

Respectfully submitted,



Latonia Gordon
Technology Asset Manager
Motorola, Inc.

Date:

June 8, 1998