

NARRATIVE STATEMENT

By this application, Motorola, Inc., seeks a new Experimental Radio license to operate facilities within 80 kilometers of the following locations:

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

Motorola proposes 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.

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.

Motorola submits that grant of this application will serve the public interest, convenience, and necessity. The Commission's grant 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.