

NARRATIVE STATEMENT

Pursuant to Section 5.54 of the Commission's rules, 47 C.F.R. §5.54, Motorola Solutions, Inc. ("MSI") respectfully requests a modification of its Export Only ("XE") conventional experimental license issued under call sign WK2XOZ, which authorizes MSI to conduct low power testing of base station and subscriber devices indoors within its facilities. Its current license authorizes such operations at MSI facilities located in Elgin, Illinois (Location No. 1), and Allen, Texas (Location No. 2). By this application, MSI seeks a modification of its license to conduct operations almost identical to those authorized under Location No. 2 at its new facilities recently constructed in Plantation, Florida (proposed Location No. 3).

In addition, MSI respectfully seeks expedited processing of this application so that it may commence its proposed operations at the new site on or before **August 3, 2026**, as justified in its separate "Request for Expedited Treatment" separately uploaded to the Experimental Licensing System ("ELS") in connection with this application for modification. As discussed in that request, expedited processing will allow MSI to meet the requirements of a government entity overseas who seeks to deploy the equipment to meet its urgent and critical public safety communications needs.

In support of this request, the following is shown:

1) Applicant's Name, Address, and FCC Registration Number ("FRN"):

Motorola Solutions, Inc. (FRN: 0002861649)
Attention: Gregory J. Buchwald, DMTS Engineer
2000 Progress Parkway, 7th Floor
Schaumburg, IL 60196
Telephone: 815.351.4020
Email: Greg.Buchwald@motorolasolutions.com

2) Contact Information:

Technical Point of Contact ("POC") and "Stop Buzzer POC:

Gregory Buchwald
DMTS Engineer
Motorola Solutions, Inc.
2000 Progress Parkway, 7th Floor
Schaumburg, IL 60196
Telephone: 815.351.4020
Email: greg.buchwald@motorolasolutions.com

FCC Contacts:

Kurt DeSoto
Wiley Rein LLP (FCC Counsel)
2050 M Street, N.W.
Washington, DC 20036
Telephone: 202.719.7235
Email: kdesoto@wiley.law

3) Description of Operation and Purposes:

MSI requests authority to perform very low power testing of two-way mobile radio systems designed to operate under the TETRA and Project 25 (P25) standards at a third location, at Plantation, Florida. The purpose of these transmissions is to calibrate, test, evaluate, and conduct proof of performance of equipment prior to export. Such activities will also include indoor deployment of the equipment under identical parameters specified in the authorization for purposes of user operational training, which will occur on a limited, periodic basis for no longer than a few hours per month and only during regular business hours.

Equipment to be operated will include both base station infrastructure equipment and subscriber devices. All of the tested devices are being manufactured to be exported out of the United States or for U.S. Federal agencies, so the requested frequency bands include allocations that are not normally available for non-government users in the United States. Grant of this application will enable MSI to continue pursuing global market opportunities while generating US-based employment opportunities. Grant of this application will also allow MSI to continue to develop and produce equipment for Federal system deployment.

Equipment utilized during these tests will operate at low power levels. All base station equipment will terminate into RF attenuators to ensure that conducted RF output levels will be reduced to a maximum level of 0dBm/1mW. Tests will be conducted indoors at the Plantation site. MSI will limit the power, area of operation, and transmitting times to the minimum necessary to support an effective indoor, immediate area demonstration and collection of data. MSI proposes to limit emissions levels at the physical confines of the building to -90dBm or lower.

Given that its activities will be conducted completely indoors and the devices will be operated at very low power levels, it is MSI's understanding that this application is eligible for an exemption from review and coordination by the Interdepartmental Radio Advisory Committee ("IRAC"), as MSI believes was the case in connection with its previous application for this call sign, submitted under ELS File No. 0124-EX-CM-2023, covering its site at Allen, Texas. A similar exemption applied here would serve the public interest by facilitating expedited processing of its application to meet the urgent and critical public safety communications needs described in MSI's accompanying "Request for Expedited Treatment."

4) Classes of Stations and Number of Units:

Fixed: Up to 10 units at any given time per location, not to exceed 30 units in the aggregate under the license at all locations.
Mobile: Up to 25 units at any given time per location, not to exceed 75 units in the aggregate under the license at all locations.

5) Address of New Location and Proposed Operations:

A limited number of temporary fixed and portable would be operated indoors only within a radius of 0.25 kilometers of a new facility located at:

8000 West Sunrise Blvd.
Plantation, FL 33322

Coordinates: N26° 08' 38.0"; W080° 15' 12.0" (NAD83)

6) Equipment To Be Used:

During the term of this license, the equipment to be utilized will include, among other devices:

- GTR8000 Base Station radio
- APX-family of subscriber units including APX8000, APX7000, APX6000, APX4000 devices, and APX3000.
- MTS1, MTS2, and MTS4 Tetra Base Stations
- ST7000, MTP8000EX, ST7500, MTP3000, MTP6650 Tetra subscribers

7) Frequencies Requested at New Location:

The frequencies requested for the new location at Plantation, FL (Location No. 3) are:

- 406.1-420 MHz (for U.S. Federal agency use)
- 410-430 MHz (TETRA; export only)
- 380-400 MHz (P25 for U.S. Federal agency use)
- 440-450 MHz (P25; export only)
- 440-470 MHz (P25 and TETRA; export only)
- 806-817 MHz/851-862 MHz (P25 and TETRA; export only)

MSI notes that its current experimental license authorizes it to conduct tests on 255 MHz and in the band 350-380 MHz at Location No. 1 in Elgin, Illinois. MSI continues to need a license to operate on those frequencies at that location. It does not seek a license to operate on 255 MHz and in the 350-380 MHz bands at its facilities located in Plantation, Florida.

8) Power Levels:

All devices, FX and MO, will be attenuated to a conducted power level not to exceed 1 mW transmitter power output ("TPO") and a mean effective radiated power ("ERP") of 10 uW.

9) Type of Emission, Modulation Technique, and Bandwidth Required:

MSI proposes to operate using APCO Project 25 phase 1 and phase 2 waveforms on the downlink and up link allocations. In addition, MSI also proposes to utilize TETRA waveforms on downlink and uplink allocations. Emission designators requested are listed below. Other emission modes may be utilized, but in no event will the emissions extend beyond the frequency bands requested.

Prior to operation, MSI will determine the exact center frequency of operation utilizing spectrum scans at the Plantation, FL location, use of the FCC database to determine the existence of prior licensed services, and the FCC database to determine if any licensed Earth stations reside within the test area requested. Additional channel quality methods will also be utilized during each test activation.

- TETRA: 21K0D1W
- P25: 8K10F1D, 8K10F1E; 8K10F1W
- P25 phase 2: 9K80D7W, 9K80F1D, 9K80F1E, 9K80F1W

10) Overall Height of Antenna(s) Above Ground/Orientation:

No antennas will be installed in a fashion that will require approval under FAA and FCC rules and regulations.

Antennas utilized will be located indoors with an efficiency not to exceed 0dBi. Antennas will be located no higher than 2 meters above floor level on the ground floor of the interior of the building. No outdoor antenna placements will be utilized.

11) Protection Against Interference:

MSI understands that it must accept interference from any other users of these bands and that all operations by MSI will be on a secondary basis and must not cause interference to operations approved to operate in the band. MSI has established a point of contact ("POC") identified above with "stop buzzer" authority, and it agrees to cease operations immediately upon receipt of request to the POC.

MSI does not expect the proposed operation to cause interference with any licensed operation. Should interference occur, however, MSI will take immediate steps to resolve the interference, including if necessary arranging for the discontinuance of operation.

MSI will coordinate its experimental operations with licensees in the 454-459 MHz band and the 809-824/854-869 MHz band within 1 mile of the contours of the testing location, as the proposed operations are low power.

12) Restrictions on Operation:

MSI is not seeking a license to perform a market study of unapproved devices. All tested equipment will remain under control of MSI.

13) Public Interest Statement:

MSI submits that issuance of a modified experimental license as requested is in the public interest, convenience, and necessity. Grant of such modification will help support MSI's efforts to develop innovative equipment that will accommodate the communications needs of potential users. In addition, grant of an experimental license would allow MSI to utilize U.S. labor to produce equipment for export purposes.