

We will be demonstrating fixed, low-power, point to point, transmit and receive, indoor, short-range (12 feet), using frequency bands in the following ranges: 26.5-29.5 GHz, 37-43 GHz, 24.25-26.5 GHz, with the transmitter antenna pointed parallel to the horizon. We will be testing new chip designs using the stated frequency ranges.

These assessments will provide engineering data relevant to the operation of devices on wireless carriers' future 5G networks. Movandi respectfully requests that the Commission grant its request to modify its license for operations in accordance with Section 5.3(j) of its rules.² Movandi intends to transmit from two fixed points located at Movandi facilities in Irvine, CA, Mobile World Congress America 2020 (LA Convention Center), Los Angeles, CA. These transmissions will be consistent with the parameters and equipment identified in Movandi's accompanying Form 442, and will include the use of a phased array and horn antenna with a half-power beam width of 20 degrees in the E-plane and H-plane and a down tilt between 20 - 25 degrees. Movandi anticipates that it will conduct its experiments for a period not to exceed 12 months.

Movandi is aware of and will abide by its obligations under Section 5.84 to conduct its experiments in a manner that will not cause harmful interference to incumbent licensees.³ Movandi intends to coordinate its operations with existing microwave users in the area, and anticipates that such coordination will be a condition of operation for its license.

With respect to Part 25 operations, the 29 GHz band is allocated for earth-to-space transmissions, and the Commission has determined that it is unlikely that aggregate energy from 29 GHz terrestrial operations would result in harmful interference to satellite receivers.⁴

In addition, as the Commission has recognized, the 39 GHz band "is currently unused by satellite operators."⁵ Nevertheless, Movandi will also abide by any coordination requirement for Part 25 operations issued as a condition of operation for its license.