

John Kennedy

From: Sochurek, Jan E. [jan.sochurek@ngc.com]
Sent: Tuesday, June 20, 2006 2:22 PM
To: John Kennedy
Cc: Schuemann, Vance W.; Fremd, Rodney W.
Subject: Re Question of XX on FCC File #0047-EX-PL-2006

John,

After the phone call you and I had yesterday afternoon, Rod Fremd and I have talked about the emission designator matter more. In review, we feel there could be a change in the designator from "XX" to "XN".

The Pulse Width (PW) of this radar is 0.5uSec - 9.0uSec and the Pulse Repetition Rate (PRF) is 4kHz - 100kHz. Both of these vary continuously as a pulsed signal. Many of the selections for the nature of signals modulating the main carrier, paragraph 2.201(d)(1) through (8), relate more to radio communications than radar. Based on this approach we feel that the X, cases not otherwise covered, is the correct answer for modulation on the main carrier.

Since this is a radar unit, we could change the second X to N, meaning no information being transmitted. In radar, we are looking for reflections and not information.

If you have any further questions, don't hesitate to contact me.

Regards,

*JAN SOCHUREK - Spectrum Licensing
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Radio Frequency Spectrum and Licensing
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(410)765-5626*

6/21/2006

John Kennedy

From: Sochurek, Jan E. [jan.sochurek@ngc.com]
Sent: Thursday, June 15, 2006 4:32 PM
To: John Kennedy
Cc: Fremd, Rodney W.; Schuemann, Vance W.; Siddall, David R.
Subject: Re: 0047-EX-PL-2006

John,

I am sorry this is getting back so late to you. Vance Schuemann (of Paul Hastings) touched base with me yesterday to verify if I had answered your request since it was coming up on the 30 day deadline. I didn't know anything about this because I had not received the e-mail before this. In looking at your e-mail, Vance and I realized that my last name was spelled wrong on the e-mail address as a result of a misspelling on the FCC Form 442. I apologize for this oversight.

File Number 0047-EX-PL-2006 is a new license application to replace the STA FCC File # 0445-EX-ST-2005 (WB2XCF) per the request of NTIA. This is due to the fact that the STA had been renewed a couple of times.

Part 5.103 of the FCC's rules indicates that "Stations in the Experimental Radio Service may be authorized to use any of the classifications of emissions covered in part 2 of this chapter." Accordingly, the use of "XX" in the emission designator 600MFXX is provided pursuant to part 2.201(d)(8) and (e)(9) of the FCC's rules since it involves "[c]ases not otherwise covered." The FCC has previously authorized the use of "XX" in the emission designator 600MFXX for this program under File Nos. 0445-EX-ST-2005, 0006-EX-ST-2005, 0414-EX-ST-2004, 0181-EX-ST-2004, 0405-EX-ST-2003, 0143-EX-ST-2003 and 0398-EX-ST-2002. For an explanation of emission for this program, please refer to amendment exhibit under File No. 0398-EX-ST-2002.

The nature of the signal modulating the main carrier (second symbol, first X) is a chirped linear FM signal across the 600 MHz bandwidth. Each chirp is a different piece of the frequency over that 600 MHz of the band. The chirp varies based on distance from the related test point or object. The type of information transmitted (third symbol, second X) is none of those listed in 2.201(e)(1) through (9).

If you have any other questions or concerns, don't hesitate to contact me.
Regards,

*JAN SOCHUREK - Spectrum Licensing
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