

EXHIBIT I

PARTICULARS OF OPERATION

P-Com, Inc. (P-Com) is a manufacturer of fixed wireless microwave radio equipment and related equipment that is used in the United States and in foreign countries for high-speed Internet access, data communications and voice communications. P-Com has offices and facilities in Campbell, CA, in Melbourne, FL, in Dulles, VA and at various international points. A description of P-Com and its product lines can be obtained at the URL: <http://www.p-com.com>.

By this application, P-Com seeks authority to conduct tests of its Point-to-Multipoint (PMP) systems equipment. These tests will be used by P-Com to develop and improve its PMP systems, to demonstrate their operation to potential purchasers of the equipment, and to improve the ability of the equipment to operate with P-Com's MIS. Tests may include those designed to assist in improving the efficiency and capability of the equipment, in improving adjacent channel rejection, in establishing frequency coordination requirements, in establishing path performance data, in establishing antenna envelopes, in testing new equipment designs and in testing customer-specific designs. No marketing tests will be conducted. P-Com employs an experienced technical staff. In P-Com's experience, such experimentation is invaluable adjunct to theoretical design in the development of more efficient radio equipment and better radio products. Indeed, P-Com would expect some new knowledge of propagation theory to derive from the tests.

At present, P-Com's PMP systems equipment is an advanced digital Broadband Fixed Wireless Access (BFWA) system with 200 Mbps data throughput per Sector. It is designed to provide cost-effective solutions for the transport of data, Internet, voice and video content over wireless networks. PMP supports Asynchronous Transfer Mode (ATM) and Time Division Multiplexing (TDM) based services over 10GHz to 38GHz frequency bands via highly efficient QPSK, 16-QAM and 64-QAM modulation techniques. PMP employs both FDMA and TDMA access methods along with QoS based Traffic Management and Bandwidth-on-Demand (BoD) providing efficient wireless access to multi-tenant buildings, Small/Medium/Large Businesses, and network service providers.

The presently marketed PMP system delivers data throughput of 200 Mbps/Sector and 40 Mbps/Remote (uplink and downlink) in sectors ranging from 15° to 90° wide that can extend up to 10 km. Multiple sectors can be arranged to provide full 360° coverage at a base station.

At present, P-Com's PMP equipment consists of indoor units (IDUs) and outdoor units with integrated antenna systems (ODUs), connected via a single IFL coaxial cable. This system provides all the necessary elements to provide a complete fixed wireless solution.

Authority is sought to operate in the following frequency bands:

10.15 – 10.65 GHz
24.25 – 25.25 GHz
24.55 – 26.06 GHz
27.35 – 28.35 GHz
38.60 – 40.00 GHz

All of these frequency bands are allocated under Part 101 of the Commission's Rules. All experimental operations will be conducted in accordance with applicable portions of Part 101. In this regard, antenna beam widths, E.I.R.P. limitations, emission limitations and other pertinent technical limitations and requirements of Part 101 for the operation of fixed microwave systems will be observed. In this regard, a combination of directional, cardiod and omnidirectional antennas of various beam widths, gains and patterns may be employed as per Rule 101.115(a).

P-Com intends to experiment with QPSK (D1W), QAM (G1W), TDMA (D7W) and FDMA (G1W) modulation types.

P-Com manufactures transceiver equipment operating in each of those frequency bands. While there may be some similarities among those bands, there is enough variability in equipment design and propagation characteristics to justify P-Com's experimentation on all of those frequencies.

P-Com will take such measures as reasonably required to prevent interference to operations protected from interference from secondary experimental operations. Those measures will include, as appropriate, frequency coordination through contact with licensees who may be effected by P-Com's program of experimentation. In the even that such experimentation results in interference to primary radio frequency operations, P-Com will cease such interfering operations promptly after learning of the interference.

EXHIBIT II

SECTION 1.307 STATEMENT

P-Com proposes to test the operation of its microwave radio products at various points within a ten mile radius of its Research and Development Facility in Melbourne, Florida. These stations will be operated on a temporary-fixed basis.

Transmission antennas will be placed, operated at such powers and labeled in accordance with Table 1, as applicable, of Rule 1.1307 so as to obviate the requirement of an environmental assessment, and otherwise will be placed and operated so as not to exceed the radio frequency radiation limits in Rule 1.1310.

Antennas will not be located in the areas described in clauses (1), (2) or (6) of Rule 1.1307(a). None of the facilities will have the affects described in clauses (3), (4) or (5) of Rule 1.1307(a). None of the facilities will involve significant changes in environmental surface features or structures employing high intensity white lights located in residential neighborhoods within the purview of clauses (7) or (8) of Rule 1.1307(a).

P-COM, INC.
FCC FORM 442
ITEM 11
JULY, 2001

EXHIBIT III

JUSTIFICATION FOR FIVE YEAR LICENSE

P-Com has requested a five (5) year license term. Under Rule 5.71(a), the Commission will grant a license term exceeding two years, but not five years, if the applicant submits a sufficient justification. A five year license term is justified in this instance because P-Com requests the experimental license not for a specific research or development project of short duration, but for regular use in developing P-Com's communications equipment product line. As P-Com's business is the manufacture and sale of the transmission systems that will be tested and developed under the license, P-Com anticipates that it will continue to need the license for such research and development much long after two years, and even after five years, has elapsed since the license grant date.

EXHIBIT IV

TRANSMITTING EQUIPMENT TO BE INSTALLED

This program of experimentation involves the use of P-Com manufactured equipment. The models will include new and experimental radios. Accordingly, the license should not specify, or be limited to specific model numbers. The number of base and response units as may be operated at any one time are (1) Base: 10 and (2) Response: 50.

It is possible that the program of experimentation could evolve to include a need to increase the number of base and/or response stations operated at any one time. P-Com would like to be able to implement such increases solely by notice to the Commission, rather than pursuing formal authorization. This notice procedure would allow P-Com to quickly implement such increases, thereby avoiding any loss in the momentum of experimentation that is so crucial to technological development. P-Com foresees no negative regulatory impact from such a notice procedure as no such increase in the number of transmitters would be reasonably expected to have an interference impact that could not be avoided by P-Com's normal and careful procedures for avoiding interference. Indeed, the notice procedure would completely support the Commission's regulatory responsibilities without the burden on Commission staff resources that would attend the need to follow a formal licensing procedure.