

First Responder Network Authority
c/o National Telecommunications and Information Administration
United States Department of Commerce
1401 Constitution Avenue, N.W., Suite 4898
Washington, D.C. 20230

June 10, 2013,

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Room TWA325
Washington, DC 20554

Re: Application of PureWave Networks Inc. for Experimental Special Temporary Authority, File No. 0497-EX-ST-2013

Dear Ms. Dortch:

The First Responder Network Authority ("FirstNet") consents to the application of PureWave Networks Inc. ("PureWave") for experimental special temporary authority ("Experimental STA") for proposed temporary operation in FirstNet's 700 MHz band spectrum to demonstrate Long Term Evolution ("LTE") equipment. PureWave would like to determine the maximum propagation of the 700 MHz signal from base transceiver stations. PureWave requests authority to test to a maximum radius of 30 miles for each base station in order to verify its theoretical calculations of the distances which the signal may reach at certain power levels.

PureWave requests short-term authority to test at three locations in Santa Clara, California. It requests an STA for 180 days from July 1, 2013 until December 31, 2013.

The Middle Class Tax Relief and Job Creation Act of 2012 ("*Spectrum Act*") charges FirstNet with incorporating "substantial rural milestones" in its deployment plans.¹ FirstNet must build, manage and operate a "nationwide" public safety broadband network.² That network will cover the 56 states and territories that have varied geographies and demographics.³ Technological innovation plays a key role in meeting this obligation in a cost-effective way. PureWave's short-term experimentation has the potential to help further this goal.⁴

FirstNet's concurrence is premised on experimental operations that conform to the following parameters:

- 1) Operation will be confined to three sites in Santa Clara, California. PureWave would test three temporary base stations, together with no more than five computer modules, five end-user devices and a wireless router, all within a 30-mile radius of each site.
- 2) PureWave requests authority from the FCC to operate over the 758-768/788-798 MHz bands, which are currently licensed on a nationwide basis to FirstNet.

¹ 47 U.S.C. § 1426 (b) (3).

² 47 U.S.C. § 1426 (b) (2).

³ 47 U.S.C. § 1401 (31).

⁴ 47 U.S.C. § 1422 (b).

- 3) Operation will occur no longer than 180 days from the date on which the FCC grants PureWave an Experimental STA, allowing time during that period for setup and testing, demonstrations, and teardown.
- 4) PureWave has analyzed information in the FCC's license databases and states that the proposed operation would not interfere or create a significant potential for harmful interference with any public safety operations in the 700 MHz band.
- 5) Operation of the experimental STA will not be used in mission-critical operations or in the delivery of live transmissions in duties to protect life, property, or safety. Operations will be confined to a 30-mile radius of each base station location.
- 6) PureWave has coordinated with Bay Area Regional Interoperable Communications Systems Authority (BayRics). BayRics has submitted a letter confirming that the Experimental STA will not interfere with any planned early deployment in the area.
- 7) This Experimental STA is non-renewable and any Experimental STA use of radio frequencies licensed to FirstNet beyond the 180-day period to which this application refers must be made by a separate request for such use by PureWave.
- 8) PureWave understands that an experimental license only permits shared use of the subject radio frequencies and that it may have to coordinate with other entities licensed for experimental purposes.

For the reasons given above, FirstNet concurs with the proposed experimental STA for PureWave on certain frequencies currently licensed to FirstNet. This consent is subject to the FirstNet's ongoing ability to monitor any operations and use of FirstNet's licensed spectrum.

Respectfully submitted,



Susan G. Swenson
Board Member
First Responder Network Authority

cc: Genaro Fullano, Associate Chief
Public Safety and Homeland Security Bureau
Don Meiners, Chief Executive Officer
PureWave Networks Inc.
Rafi Cohen, Product Manager
PureWave Networks Inc.