



December 12, 2013

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

Re: Application of PureWave Networks Inc. for Experimental Special Temporary Authority, File No. 1072-EX-ST-2013

Dear Ms. Dortch:

The First Responder Network Authority ("FirstNet") consents to the application of PureWave Networks Inc. ("PureWave") for renewed 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 continue testing to determine the maximum propagation of the 700 MHz signal from base transceiver stations, as well as handover performance between small cell base stations. PureWave requests authority to continue testing to a maximum radius of 30 miles for each base station in order to verify its theoretical calculations of the distances which the 700 MHz LTE signal may reach at certain power levels and heights.

PureWave requests short-term authority to continue to test at three locations in Santa Clara, California until June 30, 2014. PureWave states that necessary coordination with device vendors slowed its efforts during the term of the present STA. PureWave explains that it needs more time to complete its testing program. FirstNet has previously determined that PureWave's testing has the potential to provide innovative solutions for meeting FirstNet's statutory coverage requirements.¹

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

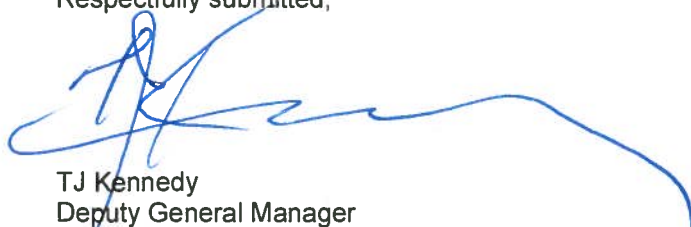
- 1) Operation will be confined to three sites in Santa Clara, California. PureWave would test three temporary base stations, together with a small number of end user or vehicular devices, all within a 30-mile radius of each site.
- 2) PureWave requests authority from the FCC to operate over the 758-768/788-798 MHz bands, which are currently licensed on a nationwide basis to FirstNet.

¹ See, e.g., 47 U.S.C. §§ 1422 (a); 1426 (b) (2) & (3); Letter from Susan G. Swenson, FirstNet Board Member, to Marlene H. Dortch, Secretary, Federal Communications Commission, OET File No. 0497-EX-ST-2013 (dated June 10, 2013).

- 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 continuation of the PureWave 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,



TJ Kennedy
Deputy General Manager
First Responder Network Authority

cc: Erika Olsen, Special Counsel
Public Safety and Homeland Security Bureau
Don Meiners, Chief Executive Officer
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