



September 7, 2006

OET Experimental Licensing:

QUALCOMM Incorporated ("QUALCOMM") hereby requests consideration for approval of its STA application 0536-EX-ST-2006 that was submitted on July 19, 2006.

QUALCOMM will be using this STA for testing of FLO technology in San Diego. FLO is a technology invented by QUALCOMM to deliver efficient and cost effective video content to cell phones. In the United States, MediaFLO USA will deploy the FLO technology commercially in the 700 MHz band on spectrum for which QUALCOMM holds licenses. QUALCOMM is also pursuing commercial deployment of its FLO technology in other countries throughout the world that will require the system to operate with different occupied bandwidth configurations..

As part of this system testing, QUALCOMM has committed a significant amount of resources and capital expense on the development and deployment of a test network in San Diego to support testing of all aspects of the system. The STA in question was filed to support the initial testing of the FLO technology that was developed with the higher bandwidths. Approval of QUALCOMM's STA request is requested so that the testing of this new FLO system operating at higher bandwidths can be tested quickly and then shown to operators, regulators, and others around the world.

While the STA request has been pending, the network hardware has since been ordered, built, delivered, installed, and is currently ready to begin an in initial phase of over-the-air evaluation testing. QUALCOMM's technology development schedule is highly dependant upon the outcome of this initial testing and so it is extremely important that this STA is approved expeditiously in order to begin this testing on schedule.

The QUALCOMM research and development schedule has taken into account the STA application period of 30-60 days as stated on the OET internet link "Guidelines for Experimental Special Temporary Authorization." We are aware that there are a large number of STA requests pending, and so our concern is that the 60 day turn-around period may be exceeded, which will cause us to miss the scheduled start of this important over-the-air testing, which will then delay us from showing this technology in markets around the world.

QUALCOMM is requesting consideration of this matter and asking that the FCC approve this STA within the 60 day filing period which will align with the "outside" schedules set for extremely time sensitive research and FLO technology development. The original STA application STA 0536-EX-ST-2006 was filed on July 19th 2006, and we planned for approval within 30-60 days with the latest date for approval being September 19, 2006.

We would be grateful for a grant of the STA by September 19th 2006 or notification of another date by which we can expect this STA to be completed.

Sincerely,

Dean Brenner
VP, Government Affairs.
QUALCOMM Incorporated