

APPLICATION FOR RENEWAL OF EXPERIMENTAL LICENSE

Pursuant to Section 5.71 of the Commission's rules, Qwest Corporation (the "Applicant") seeks to renew its experimental radio service station license (WD2XTK), for a period of 18 months, up to and including May 1, 2009, in order to continue its technical trial of non-type accepted wireless broadband equipment utilizing Worldwide Interoperability for Microwave Access (WiMAX) technology in the 3.5 GHz band. The instant request seeks license renewal only; Qwest proposes to continue conducting its experimental operations consistent with all technical parameters set forth in its current instrument of authorization. For the reasons set forth below, the Applicant respectfully submits that favorable Commission action on the instant request will serve the public interest, convenience and necessity.

Background

The Applicant is a wholly-owned, indirect subsidiary of Qwest Communications International Inc. (together with the Applicant, "Qwest"), a premier provider of full-service voice, video and data services for people at work, home and on the move. Indeed, Qwest's broadband network, designed with the latest advances in network technology for speed and efficiency, spans the globe, enabling new products and services that benefit businesses and consumers worldwide. In order to continually expand, enhance and evolve these service and product offerings, Qwest aggressively seeks out and tests new technologies to enable broadband connectivity.

Purpose of Request

Since initiating experimental operations, Qwest has been testing WiMAX hardware, software and network management systems. To date, the results of these experiments have been excellent, yielding valuable technical and operational data. In order to expand its knowledge of WiMAX technology, Qwest seeks Commission authority to continue these experiments. In particular, Qwest seeks to compile additional technical data from operational monitoring, including mean-time failure rates and service outage statistics, as part of its larger analysis of long-term system reliability. Qwest also plans to study new WiMAX technologies and products, such as handoff protocols, adaptive antenna systems, new indoor consumer premises equipment and, in general, newly-certified WiMAX component hardware. Finally, Qwest proposes to conduct load testing of new software and firmware releases.

By continuing its experimental operations, Qwest expects to gain a fuller understanding of the strengths and limitations of WiMAX technology in providing broadband IP access, video distribution, voice services, and other wireless broadband services and products. Qwest understands and acknowledges that its experimental

operations must be conducted on a secondary basis only. Accordingly, Qwest will adhere to good engineering practices at all times, and will suspend operations in the event its experimental program causes harmful interference to primary users of the band. Moreover, Qwest will continue to exercise appropriate care to ensure that all end-user equipment is returned once its experimental trials conclude.

Public Interest Benefit

Qwest's experimental program already has generated valuable technical data regarding a promising new technology for delivering wireless broadband access. As a leading provider of broadband solutions, Qwest is ideally suited to test and evaluate the utility of this new technology, including the new round of testing described above. Accordingly, Qwest respectfully submits that inasmuch as approval of the instant application for license renewal will benefit the development of wireless broadband technology, and will thus help advance the art of radio science, it should be granted as consistent with the public interest, convenience and necessity as expeditiously as possible.