

DESCRIPTION OF EXPERIMENTAL TRIAL

Pursuant to Sections 5.3(a), 5.3(g) and 5.3(i) of the Commission's rules, Qwest Corporation (the "Applicant") seeks an experimental radio service station license in order to conduct a technical trial of non-type accepted wireless broadband equipment utilizing Worldwide Interoperability for Microwave Access (WiMAX") technology in the 3.5 GHz band. 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 leading provider of voice, video and data services. Indeed, Qwest's broadband network, designed with the latest advances in network technology for speed and efficiency, spans more than 156,000 route miles globally, 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.

Proposed Experimental Trial

The purpose of this application is to obtain Commission authority to test non-type accepted WiMAX equipment in order to determine its utility for providing broadband wireless access. Toward this end, Qwest is in the process of soliciting bids from various equipment manufacturers to provide it with base station and end-user equipment that conforms to the IEEE 802.16d standard and the technical parameters referenced herein. Since no WiMAX equipment designed to operate in the 3.5 GHz band has been type accepted, Qwest's evaluation of this equipment will be conducted on an experimental basis.

Following vendor selection, Qwest proposes to conduct an experimental trial involving the deployment of up to 250 end-user devices located within a 10 kilometer radius of two fixed based stations. Specifically, Qwest proposes to construct base station facilities at its offices in Mead, Colorado and Littleton, Colorado, and to deploy end-user equipment at various business locations (including other Qwest offices) and residential locations in surrounding areas.¹ The purpose of this experiment is to accurately assess the performance characteristics of WiMAX under a variety of topographical and

¹ Each of the base stations will be configured with three-sector antennas that in combination will provide omni directional coverage around the two fixed sites. As set forth in the preceding FCC Form 442, Qwest anticipates deploying up to 200 end-user devices near its Mead site, and up to 50 end-user devices near its Littleton site.

operational situations including, but not limited to: throughput, signal quality, multi-path issues, range, etc. Qwest will not charge customers to participate in the trial, and will require trial participants to relinquish all equipment at the end of the experimental period.

Upon completion of this experimental trial, Qwest hopes to have 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.

Public Interest Benefit

The experimental program proposed herein will benefit the public by providing 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. Accordingly, Qwest respectfully submits that inasmuch as approval of the instant application 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.