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31 January 2019

Federal Communications Commission
OET Experimental Licensing Branch

Subject: Supplemental Statements for Program Experimental License

Reference: 47 CFR Part 5 §5.63(d)(1) "A narrative statement describing how the applicant meets the eligibility criteria set forth in subpart E of this part"

Reference: Application File Number: 0002-EX-PN-2019

Reference: FRN: 0018271999

To Whom It May Concern:

I am pleased to provide information regarding Rincon Research Corporation's suitability to receive a Program Experimental License under Title 47 CFR Part 5. Rincon Research Corporation is an employee-owned company of approximately 270 people. Its main headquarters are Tucson, AZ and satellite offices are located in Centennial, CO and Chantilly, VA. It qualifies for a Program Experimental License in three categories defined by §5.302 Eligibility. It is a research laboratory, it manufactures specialized radio frequency equipment, and it integrates radio frequency equipment into its end products. As evidence, I provide the following information from our web site at www.rincon.com regarding our technical expertise to manage Experimental Programs.

"Rincon Research is an incredibly vibrant organization that conceives, analyzes, designs, implements, and tests software solutions for some of the most intriguing Government projects. As a small business headquartered in Tucson, Arizona, we have a 30+ year history marked by steady growth in both revenue and customers.

Rincon Research's support of NASA's Space Network Ground Segment Sustainment (SGSS) program earned us the 2013 Small Business Subcontractor of the year award from the Goddard Space Flight Center. Our development of Main Mission Frontends will move NASA into the next generation of ground system solutions.

Founded in 1983, Rincon Research began as a small research company. Today our business serves a variety of Government agencies. We have diversified through the expertise of our talented teams of scientists, engineers, programmers, writers, and support staff who continue to focus on rapidly developing technology from concept to operation. Our digital signal processing products and services ensure successful outcomes to meet mission and business objectives."

Further information may be found on our web site that lists several product lines in the general area of software defined radios and FPGA-based products.

Rincon Research has also, since its inception, sponsored an active Internal Research and Development program involving radio and satellite applications. We also cooperate with other organizations on research projects. For example, three Rincon employees were founding members of TAPR (Tucson Amateur Packet Radio). More recently, Rincon Research teamed with University of Arizona to sponsor one of the first CubeSats and is currently working on other university projects. We have sponsored university students over the last several years to work with our researchers on topics ranging from Radio Astronomy, GPS, adaptive antennas, millimeter-wave, and satellite design.

ELIGIBILITY 5.302 (a) “The radiofrequency experimentation will be conducted in a defined geographic area under the applicant's control;”

The experimentation will take place on adjacent properties owned or controlled by Michael N. Parker and Carol A. Parker. Michael Parker is the founder of Rincon Research Corporation. Rincon Research will have access to perform and control experiments per agreement between the Parkers and Rincon Research. This property consists of approximately 100 acres of mostly undeveloped wooded and desert land in Pima County, Arizona North East of Tucson spanning Sabino Creek between Cloud Road and Bear Canyon Road. The Parker's currently own over 100 acres of contiguous land where the experiment program will be conducted.

ELIGIBILITY 5.302 (b) “The applicant has institutional processes to monitor and effectively manage a wide variety of research projects.”

Rincon Research has been in the business of performing and managing research projects for the U.S. Government for over 30 years. Most of our employees have advanced degrees in electrical engineering, physics, or math.

ELIGIBILITY 5.302 (c) “The applicant has demonstrated expertise in radio spectrum management or partner with another entity that has such expertise.”

Rincon Research Corporation has held several Experimental Licenses without incidents. We have extensive equipment such as spectrum analyzers, receivers, and signal capture and analysis equipment. Our work for the U.S. Government in signals analysis provides our engineers with tools to understand what parts of the spectrum is being used in a specific area and to avoid interference. We may, on occasion, consult with spectrum management companies. However, we have a great deal of expertise and will normally perform our own analysis. We have the expertise to engage directly and in advance to avoid interference to local companies that might be affected by our operations.

Thank you,

Michael Garcia
RINCON RESEARCH CORPORATION
Chief Engineer, Advanced Systems Business Unit