



August 28, 2009

By Electronic Mail

Julius P. Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

*Re: Experimental License of Tecore Inc. (File No. 0202-EX-PL-2009)
and Proposed Demonstration at Jessup, Maryland Correctional Facility*

Dear Mr. Knapp:

Pursuant to the experimental operating authority requested in the referenced application, Tecore Inc. will participate in a demonstration of various technology alternatives to the illegal jamming of wireless communications as a solution to the growing problem of use of contraband wireless devices within the Federal, state and local correctional facilities of the United States. The single-day demonstration has been organized by the Maryland Department of Public Safety and Correctional Services for September 3, 2009, and will be observed by corrections and other officials from Maryland and other states. Tecore was invited to demonstrate its Intelligent Network Access Controller (iNAC) managed access solution to the contraband device problem. It is my understanding that other vendors will demonstrate cell detection and other non-jamming technologies.

As we have detailed in the referenced application, the iNAC solution involves the intelligent management of access to the existing wireless communications networks providing service coverage to the area of a correctional facility (herein, the "macro networks"), by identifying and releasing to the macro networks any authorized device, while identifying and "holding" (i.e., disallowing macro network access) any unauthorized device. In so doing, the transceivers operating with the iNAC must transmit on spectrum licensed to the macro networks by the Commission.

On July 13, 2009, the Cellular Telecommunications Industry Association (CTIA) wrote to you on behalf of its members specifically supporting the grant of our application. In the letter, CTIA's Vice President for Regulatory Affairs, Christopher Guttman-McCabe, stated the view that the iNAC solution has merit and discussed the importance of the proposed testing and demonstration of the technology. The letter notes in particular that prior to any experimental use of licensed spectrum Tecore must be required to engage in frequency coordination with the affected operators. The letter notes further that CTIA's members consider such coordination feasible and such testing desirable.

Specifically with regard to the demonstration requested by the State of Maryland on September 3, we have worked with the four major carriers in the area of the Jessup facility – AT&T Wireless, Sprint, T-Mobile and Verizon Wireless – to identify suitable spectrum for use by Tecore in the demonstration and to avoid interference with or disruption to the commercial operations of those carriers and the ability of their customers in and around the facility to successfully complete calls and messages. Each of the carriers has been extremely cooperative with Tecore's efforts and have devoted significant resources to understanding Tecore's technology and supporting the demonstration. To reiterate the CTIA letter to you, each of these carriers supports the referenced application and the demonstration of the Tecore equipment at Jessup. The details of the proposed demonstration are attached.

As expressly acknowledged below, each of the identified carriers agree to coordinate and allow Tecore to operate at low power and within a very small coverage footprint in their licensed spectrum on the day of the demonstration (September 3) and during the preceding day of set up (September 2). Each of the carriers is aware of the details of the proposed demonstration and the measures to be followed to ensure that no actual service or subscriber is affected by the demonstration, as detailed in the attachment. Each of the carriers accepts responsibility for the failure of an actual subscriber communication which may occur, despite preventive measures, during the demonstration and as the result of the demonstration. The carriers acknowledge their understanding and agreement to the conduct of the demonstration as set forth in this letter by the signatures below of their representatives.

I look forward to receiving the expeditious grant of the referenced application so that the proposed demonstration at Jessup can proceed as scheduled.

Regards,

A handwritten signature in dark ink, appearing to read "Stephen D. Hayes". The signature is fluid and cursive, with a long horizontal stroke at the end.

Stephen Hayes
Vice President and General Counsel

Description of Jessup, Maryland Demonstration of Tecore iNAC Solution

Tecore has been invited and plans to participate in a coordinated demonstration of the iNAC solution at the Jessup Correctional facility in Maryland. The focus of the pilot program will be to demonstrate the iNAC capabilities for both GSM and CDMA technologies across multiple operators and frequency bands. The demonstration will be carried out during a two-day period on September 2-3, 2009. During this timeframe, the operation of a mobile unit, in which a fully operating iNAC will be installed (together with the transceiver equipment necessary to manage the network access of controlled test subscriber devices operable on the networks of the four major carriers in that area – AT&T Wireless, T-Mobile, Sprint and Verizon Wireless) will provide targeted operation in an isolated area of the prison.

The demonstration will showcase the ability of the iNAC solution to “catch and hold” as well as “catch and release” standard wireless devices from the carrier networks that will participate in the demonstration by agreeing to the coordinated operation of the necessary transceiver equipment in certain frequency bands currently licensed to each of these four carriers in the area of the prison, within a very limited geographic area and without interference to or disruption of their network operations.

The cellblock to be used is currently uninhabited and will provide a controlled environment in which to conduct the demonstration. Only test wireless devices brought into the cellblock (within coverage limited thereto provided by the Tecore equipment) will be operating in the area and will be affected by the Tecore equipment. No “live” subscribers of any wireless network will be within this secure area of the prison, as the facility overall has a well-posted “no cell phone” policy for both inmates and visitors. There is also a significant buffer area between the location of operation of the Tecore equipment and any area outside of the prison compound in which a live subscriber of a commercial wireless network might possibly be located. Moreover, the equipment will be operated in a way that any actual subscriber device which is in the demonstration area despite the foregoing protections will not be prohibited by the Tecore equipment from operating on the existing carrier networks and thereby completing a call or message.

The demonstration will take place during Tecore’s one-hour timeslot on September 3, as determined by the Maryland Department of Public Safety and Correctional Services personnel organizing the event. Additionally, Tecore will be actively operating the system in the targeted coverage area for several hours on September 2 during a period designated for vendor setup.

The targeted coverage area is the first two floors of the cellblock, which is approximately a 250 x 50 ft structure. Tecore will park its communications van in the courtyard in front of the targeted building. The antennas are directionalized and will be downtilted. Coverage will be directed toward the building, and power will be adjusted to limit the iNAC service to the target cellblock. The targeted cellblock is approximately one quarter mile from external access to the prison. The location of the front entrance to this section of the prison is 39° 8'42.00"N, 76°46'47.56"W.

Acknowledged and agreed:

AT&T Wireless

Joseph P. Marx
Signature

Joseph P. Marx / Assistant Vice President, Federal Regulatory
Name and Title

Sprint-Nextel Corporation

Signature

Name and Title

T-Mobile USA

Signature

Name and Title

Verizon Wireless

Signature

Name and Title

Acknowledged and agreed:

AT&T Wireless

Signature

Name and Title

Sprint Nextel

R. H. McNamara

Signature

Robert McNamara, Director, Government Affairs

T-Mobile

Signature

Name and Title

Verizon Wireless

Signature

Name and Title

Acknowledged and agreed:

AT&T Wireless

Signature

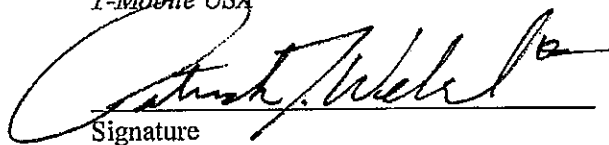
Name and Title

Sprint-Nextel Corporation

Signature

Name and Title

T-Mobile USA



Signature

Patrick T. Welsh, Sr. Corporate Counsel

Name and Title

Verizon Wireless

Signature

Name and Title

Acknowledged and agreed:

AT&T Wireless

Signature

Name and Title

Sprint-Nextel Corporation

Signature

Name and Title

T-Mobile USA

Signature

Name and Title

Verizon Wireless

Andre J. Lachance

Signature

Andre J. Lachance Assistant General Counsel - Regulatory Law

Name and Title