

NARRATIVE STATEMENT

By this application, and pursuant to Section 5.3(e), (f) and (j) and Section 5.61 of the FCC Rules, 47 C.F.R. §§ 5.3(e),(f) and (j) and 5.61 (2013), Testco, LLC respectfully seeks a six-month experimental special temporary authorization (“STA”), from July 29 through December 29, 2015, to evaluate the functionality and reliability of prototype communications equipment and technologies that will operate in the 39 GHz band.

The following information is provided in support of this request:

1) Need for a 6-month authorization

Testco, LLC, headquartered at 745 Atlantic Avenue, Boston, Massachusetts (FRN 0024669384), needs a 6-month license to accommodate testing that will be completed by the end of the year. It seeks to collect sufficient data within that time frame to assess the operational characteristics of prototype equipment and technologies to determine if additional research is required and can be funded.

2) Purpose of Operation

Testco seeks to conduct research into the performance and reliability of prototype equipment and techniques that would support point-to-point and point-to-multipoint communications infrastructure, such as "backhaul" and "backbone" communications links for services including broadband personal communications services, cellular radio, and other commercial and private mobile radio operations.

Testco does not seek authority to conduct market studies or provide communications services under the requested experimental authority. The participants in the test will be advised that: (a) the operations are being conducted under an experimental authority issued to Testco, LLC, (b) the company is responsible for the experimental activities, (c) all operations are being conducted on a non-interference basis, and (d) after the test is completed, Testco, LLC will retrieve and recover all devices that do not comply with FCC regulations. Testco understands that the FCC may specify these as well as other conditions on its authorization.

3) Spectrum Requested

Testco recognizes that the 39 GHz band is allocated for licensed uses. Accordingly, it researched the FCC’s licensing databases and proposes to operate on channels that are not currently assigned to other licensees in the area or that are on channels appearing on licenses that have now been terminated. The table in Appendix A identifies the channels within the 39 GHz band that are available for the company’s use on a non-interference basis. Nevertheless, the company is amendable to the issuance of experimental authority to use other channels should the Commission staff or interested parties prefer that it operate on other channels.

4) Technical Specifications

a. Power Levels

- i. Maximum Transmitter Power Output (“TPO”): 12 Watts Peak
- ii. Maximum Effective Radiated Power (“ERP”): 1 kWatt Peak
- iii. Necessary bandwidth: 200 MHz
- iv. Emissions: D7D
- v. Frequencies: As listed in Appendix A
- vi. Antenna: Omnidirectional
- vii. Notes: Other emission modes may be utilized, but in no event will the emissions extend beyond the frequency bands requested. All power levels will comply with the limits set forth in the FCC’s rules, including those relating to human exposure to radiation.

b. Proposed Locations

Testco seeks authority to conduct its experimental operations up to five temporary fixed locations in Boston and New York City and as listed in accompanying FCC Form 442. Specifically, Testco seeks authority to operate and demonstrate products: (i) at its own offices; and (ii) at the premises of entities working under Testco's authorization to evaluate the devices and related software. Accordingly, these operations would be consistent with the requirements set forth in Section 2.805 of the Commission's marketing rules and 47 C.F.R. § 2.805 (2013); *see also* Revision of Part 2 of the Commission's Rules Relating to the Marketing and Authorization of Radio Frequency Devices, ET Docket No. 94-45, Report and Order, released Feb. 12, 1997, at 11-13, 19-20 (“Marketing Rule Revisions”).

Within 2 km of 745 Atlantic Avenue Boston, Massachusetts 42° 21' 01"N 71° 03' 25"W (NAD83)	Within 10 km of 4 Pennsylvania Plaza New York, NY York 40° 45' 02" N 73° 59' 36" W (NAD83)
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c. Equipment To Be Used

Testco expects that it will be able to complete its experimentation with a maximum of five temporary fixed base stations at each location identified above. Moreover, Testco will also limit the power, area of operation, and transmitting times of these units to the minimum necessary to evaluate the equipment. Testco does not propose to supply station identification as set forth in Section 5.115 of the Commission's Rules.

d. Antenna Information

The antennas to be deployed will not extend more than 6 meters above the ground or manmade structure. The antennas will be installed and operated in accordance with all FCC and Federal Aviation Administration (“FAA”) rules and regulations.

5) Protection Against Interference

As noted above, Testco recognizes that the 39 GHz band is allocated for licensed uses. Accordingly, it will coordinate and cooperate with other users to ensure against interference. Moreover, company personnel will also monitor the operations of other users before commencing transmissions to avoid interference to such users. In the event that it receives a complaint of harmful interference resulting from the proposed operations, Testco will take immediate action to address the interference, including if necessary discontinuing its operations. The company has designated Mr. John Westbrook, whose contact information is provided below, to act as the “stop buzzer” for this purpose.

Notwithstanding the precautions it will take, Testco does not expect harmful interference to occur. First, the proposed operations will be limited in scope. The temporary fixed base stations will not transmit continuously during the term of the STA. Second, the company will monitor the operations of other users before commencing transmissions to avoid interference. Last, Testco has selected channels that are not currently assigned to other users.

6) Restrictions on Operation

Also as noted above, Testco does not propose to market, sell, or lease any prototype equipment to end users, however. After the experimentation and demonstrations cease, it would recall and recover all devices. If any different treatment becomes necessary during the course of its experimentation and demonstrations, Testco will seek separate and additional authority from the agency.

7) Public Interest

Testco submits that issuance of a license is in the public interest, convenience, and necessity. Grant of a license will permit Testco to research the propagation and operational characteristics of innovative equipment and technologies to support important communications capabilities.

8) Contact Information

a. Company Contact and Stop Buzzer
Mr. John Westbrook
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b. Representative Contact
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APPENDIX A - PROPOSED FREQUENCIES

Location	Band (MHz)	Channel Block	Call Sign of Terminated License
Boston	38,600 - 38,650 39,300 - 39,350	A	WPQV550
	38,650 - 38,700 39,350 - 39,400	B	WPQW258
	39,200 - 39,250 39,900 - 39,950	M	WPQV528
	39,250 - 39,300 39,950 - 40,000	N	WPQV885
New York	38,600 - 38,650 39,300 - 39,350	A	WPQV554
	38,750 - 38,800 39,450 - 39,500	D	None
	38,950 - 39,000 39,650 - 39,700	H	WPQV742
	39,150 - 39,200 39,850 - 39,900	L	WPQV839
	39,250 - 39,300 39,950 - 40,000	N	WPQV890

Testco proposes to operate on channels that are not currently assigned to other licensees in the area. The company will use specific channels within the bands identified above when necessary to avoid interference. In addition, the company will monitor the operations of other users before commencing transmissions to avoid interference.