

NARRATIVE STATEMENT

By this application, Transcore, Inc., respectfully requests special temporary authority (“STA”), beginning **April 21, 2006**, and continuing intermittently through **April 28, 2006**, to test a non-multilateration tag reader system under development for export and use by railroads in the country of India. Specifically, the system is being developed and manufactured in Albuquerque, New Mexico, for export to India, where it will operate in the 865 - 867 MHz band in India. The system is designed to transmit only a carrier to illuminate tags that use modulated backscatter techniques. It will not be marketed for use in the United States. In support of this request, Transcore submits the following:

Purpose of Operation:

Transcore proposes to test equipment in a parking lot in order to simulate its deployment along side railroad tracks. The tag will be mounted on the side of a truck to simulate the mounting of a tag on a rail car. The modulated backscatter signal that is reflected back to the reader is approximately 40 dB or more below the power transmitted toward the tag by the reader. Only a carrier is transmitted by the reader. The operation will test the design of the tag and the reader. The tag is passive in the sense that it simply imposes modulation on the reflected carrier, but does not generate an intentionally radiated signal. The reader is a special export version of the Transcore Amtech Model AR-2200 reader. The technology being employed has been used for years in the United States in the non-multilateration sub-bands of the Location and Monitoring Service operating in the 902 - 928 MHz band. As such, much of the testing has been carried out based on data gathered from operation in the 902 - 928 MHz band. However, Transcore needs to conduct final design verification using signals to be emitted in the spectrum in which the system will operate in India

Transcore respectfully requests agency action so that it may commence its experimentation beginning on April 21 in time to meet shipping commitments for product that is to be sent to India. Transcore scheduled the tests for this period to meet user requirements. It cannot re-schedule the test for any later, however, as it seeks to confirm the performance of the design in advance of shipment.

Proposed Locations:

Transcore proposes to conduct its operations on property near its engineering and production facilities in Albuquerque, NM. Not more than two tag readers operating simultaneously will be set up within one kilometer of the following location.

Albuquerque, NM North Latitude 35 deg 10' 56" West Longitude 106 deg 35' 35" Datum: NAD83
--

Technical Specifications:

Frequency (frequency stability will be maintained within 25 PPM from a cold start and 5 PPM after a five minute warm up)	865-867 MHz (base)
Station Power (all power levels will comply with the limits set forth in the FCC's rules, including those relating to human exposure to radiation)	4 W Peak ERP
Bandwidth	0.100 kHz Maximum
Modulation	No Modulation; only a carrier will be transmitted by the experimental station
Emission Designators	N0N
Station Antenna	Directional up to 12 dBi Gain

Transcore requests a waiver of the station identification requirements set forth in Section 5.115 of the Commission's rules, 47 C.F.R. § 5.115 (2004).

Interference Protection:

For purposes of the experimental activities conducted under the authority requested in this application, Transcore proposes to place the carrier so as to avoid causing interference to any licensee. The fact that Transcore needs to transmit only a carrier should greatly facilitate this placement. Transcore recognizes that the 866- 867 MHz band is public safety spectrum and that the band is designated for reassignment to public safety entities. As such Transcore would coordinate with existing licensees to select no more than two carrier frequencies and take steps to reduce the likely of any harmful interference. All operation will be under the control of Transcore personnel. In the unlikely event that interference is experienced, the Transcore contact named below will be able to have the testing shut down immediately.

Antenna Information:

The antennas will not extend more than three (3) meters above the ground and will be affixed to a temporary pole. As such, no FAA coordination is required.

Types and Number of Units To Be Tested:

Transcore requires two readers to obtain valid data and present an accurate demonstration of real-world operations. The installations will be temporary fixed facilities that direct their signal toward a tag mounted on the side of a passing truck that will move within twenty-five feet of the reader's antenna.

Restrictions on Operation:

The equipment to be used in this test is being developed solely for export outside the United States as part of a Transcore contract to develop a system of identification and location for the railroads of India. The equipment under test will be labeled as follows:

FCC STATEMENT

Permission to operate this device has been granted under experimental authority issued by the Federal Communications Commission to Transcore, Inc., is strictly temporary and may be cancelled at any time. Operation is subject to the condition that it not cause harmful interference. This device has been developed solely for export outside the United States. It may not be offered for sale or use or sold for delivery in the United States unless and until the approval of the FCC has been obtained.

Public Interest Statement:

Transcore submits that issuance of special temporary authority is in the public interest, convenience, and necessity. Grant of the authority will permit Transcore to develop innovative equipment that will promote domestic industry and provide much-needed technology to a friendly trading partner of the United States.

Contact Information:

Transcore Contact:

Chuck Johnson
8600 Jefferson Street NE
Albuquerque, NM 87113 USA
Tel. 505.856.8051
Mob: 505.301.3649
chuck.johnson@transcore.com

Legal Contact:

David Hilliard or
Kurt DeSoto
Wiley Rein & Fielding LLP
1776 K Street, N.W.
Washington, DC 20006
Office: (202) 719-7058 or 719-7235
dhilliard@wrf.com or kdesoto@wrf.com