

Triton Network Systems, Inc.
8529 Southpark Circle
Orlando, Florida 32819

April 4, 2001

Federal Communications Commission
Experimental Radio Services
P.O. Box 358320
Pittsburgh, PA 15251-5320

**Re: Triton Network Systems, Inc. ("Triton")
Request for Special Temporary Authority ("STA")
Covering Operations In The 23 GHz, 18 GHz and 26 GHz Bands**

Dear Sir or Madam:

This is a request for STA, submitted pursuant to FCC rule section 5.61, 47 C.F.R. § 5.61 (2000). Triton seeks STA, for a time period not to exceed one hundred and eighty (180) days, to test and operate fixed microwave equipment in the 21.9-22.60 GHz and 23.0- 23.6 GHz; *and* 17.7 GHz-19.7 GHz; *and* 26.05 GHz-26.66 GHz frequency bands on a geographic area basis. Pursuant to rule section 5.61, Triton specifies the following information in support of its request for STA:

(1) Name, address, phone number (also e-mail address and facsimile number, if available) of the applicant.

See above. Triton's points of contact are Michael Clark, Vice President of Engineering, 907-903-0901, and its FCC counsel, Russ Taylor, Mintz Levin Cohn Ferris Glovsky and Popeo, P.C., 701 Pennsylvania Avenue, Washington, D.C. 20004, (202) 661-8717, rtaylor@mintz.com. The FCC may correspond with Triton's counsel via facsimile no. 202-434-7400.

(2) Description of why an STA is needed.

STA is urgently required to permit the applicant to commence testing and operation of fixed wireless microwave transmission equipment *intended for US 18 GHz and 23 GHz markets, as well as exports to the Europe Union 18 GHz, 23 GHz, and 26 GHz markets*. Triton also intends to perform one or more on-site demonstrations of its equipment and associated technology. Triton previously secured experimental license (under call sign WA2XVW) for the 23 GHz and 26 GHz portion of these requests, but now desires to also test in the remaining 23 GHz frequency band and 18 GHz band for the US and European Union markets, as well as the remaining 26 GHz band to explore the European Union market.

(3) Description of the operation to be conducted and its purpose.

See above. Triton is leading manufacturer of millimeter wave digital transmission equipment intended for data and telephony providers. See www.triton-network.com.

(4) Time and dates of proposed operation.

Triton desires to commence STA operations as soon as possible, and intends to test intermittently for a period of one hundred and eighty (180) days.

(5) Class(es) of station (fixed, mobile, fixed and mobile) and call sign of station (if applicable).

Fixed.

(6) Description of the location(s) and, if applicable, geographical coordinates of the proposed operation.

Triton seeks authority to operate throughout the Orlando Basic Trading Area ("BTA"), a geographic area method of licensing used in the Local Multipoint Distribution Service ("LMDS").

(7) Equipment to be used, including name of manufacturer, model and number of units.

The transmission equipment used in conjunction with Triton's STA operations is experimental and will be manufactured by Triton. Triton may also use other "off-the-shelf" equipment, antennas, cabling, etc.

(8) Frequency(ies) desired.

Option One:

21.9-22.60 GHz and 23.1– 23.6 GHz; **and** 17.7 GHz-19.7 GHz; **and** 26.05 GHz-26.66 GHz

Alternative Options for 23 GHz – Request for specific channel pair as permitted by FCC:

Priority 1 –

23GHz US Channeling Plan 50MHz (Exp License Request) Priority 1

License Request	Lower Band		Upper Band	
	Start (GHz)	Stop (GHz)	Start (GHz)	Stop (GHz)
Channel Pair 1	TNS exp license	TNS exp license	TNS exp license	TNS exp license
Channel Pair 2	TNS exp license	TNS exp license	TNS exp license	TNS exp license
Channel Pair 3	21.900	21.950	23.100	23.150
Channel Pair 4	21.950	22.000	23.150	23.200
Channel Pair 5	22.000	22.050	23.200	23.250
Channel Pair 6	22.050	22.100	23.250	23.300
Channel Pair 7	22.100	22.150	23.300	23.350
Channel Pair 8	22.150	22.200	23.350	23.400
Channel Pair 9	22.200	22.250	23.400	23.450
Channel Pair 10	22.250	22.300	23.450	23.500
Channel Pair 11	22.300	22.350	23.500	23.550
Channel Pair 12	22.350	22.400	23.550	23.600

Priority 2 –

23GHz ETSI Channeling Plan for 112MHz (Exp License Request) Priority 2

License Request	Lower Band		Upper Band	
	Start (GHz)	Stop (GHz)	Start (GHz)	Stop (GHz)
Channel Pair 1	22.022	22.134	23.030	23.142
Channel Pair 2	22.134	22.246	23.142	23.254
Channel Pair 3	22.246	22.358	23.254	23.366
Channel Pair 4	22.358	22.470	23.366	23.478
Channel Pair 5	22.470	22.582	23.478	23.590

Alternative Options for 18 GHz – Request for specific channel pair as permitted by FCC:

Priority 1 –

18GHz US Channeling Plan 220MHz (Exp License Request) Priority 1

License Request	Lower Band		Upper Band	
	Start (GHz)	Stop (GHz)	Start (GHz)	Stop (GHz)
Channel Pair 1	17.700	17.920	18.360	18.580
Channel Pair 2	17.920	18.140	19.260	19.480
Channel Pair 3	18.140	18.360	19.480	19.700

Priority 2 –

18GHz ETSI Channeling Plan for 220MHz (Exp License Request) Priority 2

License Request	Lower Band		Upper Band	
	Start (GHz)	Stop (GHz)	Start (GHz)	Stop (GHz)
Channel Pair 1	17.700	17.920	18.820	19.040
Channel Pair 2	17.920	18.140	19.040	19.260
Channel Pair 3	18.140	18.360	19.260	19.480
Channel Pair 4	18.360	18.580	19.480	19.700

(9) Maximum effective radiated power (ERP) or equivalently isotropically radiated power (EIRP).

10 W (EIRP) for the 23 GHz Band; *and*
 10 W (EIRP) for the 18 GHz Band; *and*
 10 W (EIRP) for the 26 GHz Band

(10) Emission designator (see §2.201 of this chapter) or describe emission (bandwidth, modulation, etc.).

50M0D1D for the 23 GHz Band; *and*
 50M0D1D for the 18 GHz Band; *and*
 50M0D1D for the 26 GHz Band

(11) Overall height of antenna structure above the ground (if greater than 6 meters above the ground or an existing structure, see Part 17 of this Chapter concerning notification to the FAA).

Triton does not intend to mount its transmission equipment on any antenna structure that is greater than 6 meters above an existing structure. Triton's antenna and mounting structure are less than 3 meters in height.

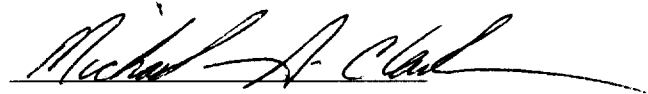
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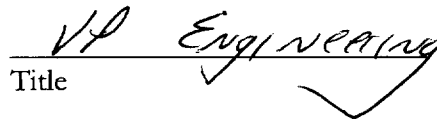
Triton certifies that it is not subject to the denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1988.

Based on the foregoing, Triton respectfully requests that the FCC issue STA for Triton to test and operate its equipment in the 23 GHz, 18 GHz, and 26 GHz frequency bands.

Respectfully submitted,

Triton Network Systems, Inc.




Title