

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

October 14, 1999

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 37-38.6 GHz Band ("37 GHz Band")**

Dear Sir or Madam:

This is a request for STA, submitted pursuant to FCC rule section 5.61, 47 C.F.R. § 5.61 (1998). 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 37 GHz Band near its Orlando headquarters.

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, Gardner, Carton & Douglas, 1301 K Street, NW, Suite 900, Washington, D.C. 20005, (202) 408-7172, rtaylor@gcd.com. The FCC may correspond with Triton's counsel via facsimile no. 202-289-1504.

(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 export to Japan. Triton also intends to perform one or more on-site demonstrations of its equipment and associated technology.

Depending on the outcome of its testing and operations, Triton may attempt to secure a "regular" Part 5 experimental authorization for the frequency assignments at issue.

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

See above. The purpose of the STA is to permit Triton to engage in short-term operations to determine whether it should develop equipment for the 37 GHz Band. Triton is leading

manufacturer of millimeter wave digital transmission equipment intended for data and telephony providers. Triton is also an existing experimental licensee for frequencies in the immediately adjacent 39 GHz band.

(4) Time and dates of proposed operation.

Triton desires to commence STA operations by November 1, 1999, and intends to test intermittently until May 1, 2000.

(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"). Triton notes that it is not aware of other FCC-licensed transmitters that are operating in the 37 GHz Band in this BTA. While there are some federal governmental stations authorized in the 37 GHz Band, Triton understands that these facilities number less than ten across the United States.

The FCC once briefly proposed to allocate the 37 GHz band for Part 101 terrestrial microwave operations in its ET Docket No. 95-183 rule making proceeding, but indefinitely postponed that plan in November 1997. Accordingly, Triton believes that this band is largely unused in the United States.

Accordingly, Triton's request for permission to operate throughout the Orlando BTA is reasonable and will not likely result in harmful interference to other users of the spectrum. Notwithstanding the foregoing, Triton understands that STAs are secondary in nature; Triton agrees to monitor the RF environment to ensure interference-free operations, and pledges to immediately discontinue operations in the unlikely event that harmful interference results.

(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.

37000 MHz to 38600 MHz – the 37 GHz Band.

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

4170 EIRP.

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

50MOD1D.

(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).

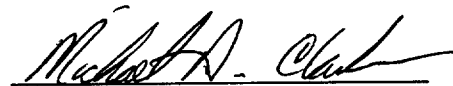
Triton does not intend to mount its transmission equipment on any antenna structure that is greater than 6 meters above an existing structure. Triton's antenna and mounting structure are less than 3 meters in height.

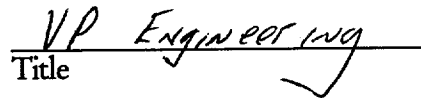
Triton certifies that it is not subject to the denial of federal benefits pursuant to the Anti-Drug Abuse Act of 1998.

Based on the foregoing, Triton respectfully requests that the FCC issue STA for Triton to test and operate its equipment in the 37 GHz Band.

Respectfully submitted,

Triton Network Systems, Inc.




Title