

Public Interest Benefits of Enhanced Testing

As described below, it is critical that the Applicant be permitted to install and test 169 transmitters throughout Atlanta's MARTA rail transit system.

As the Commission is aware, Applicant was awarded a limited Experimental authorization to permit testing on the MARTA system on March 1, 2005. That authorization included a number of restrictions including, among other matters, a limit on the number of units that could be included in the tests. The limited nature of the prior authorization prohibited Applicant from assessing whether interference-free operation could extend throughout the entire MARTA system. The added authority here sought will eliminate that issue.

There are at least five reasons why Applicant needs to test 169 Units:

(i) The nature of the MARTA system requires that Applicant test on 169 pairs of rail vehicles (hereinafter referred to as Units) in the MARTA rail transit system. The MARTA rail system is comprised of three types of rail vehicles: fifty nine (59) Model 310 railcars, sixty (60) Model 311 railcars and fifty (50) Model 312 railcars. MARTA is requiring the applicant to conduct the installation by rail vehicle type. In other words, the Applicant will complete the installation of fifty (50) Units of the Model 312 railcars before installing sixty (60) Units of the Model 311 railcars before the installation of fifty nine (59) Units of the Model 310 railcars. As each type of rail vehicle is different, it is necessary for the Applicant to test all types of rail cars throughout the entire MARTA system.

(ii) MARTA often interchanges Units when making up two, four, six or eight-car trains. The Applicant cannot control where a particular Unit will travel, how often a Unit is in service or which railcar types will make up a train. In order to effectively test all possible scenarios along all areas of the system for interference, the test must cover all Units distributed across the entire rail system,

(iii) MARTA has the capability to use Applicant's Units to provide emergency and operational messages to its passengers. Applicant's Units are intended to be an essential component of MARTA's public safety and communication infrastructure. Because of the installation schedule, it is crucial that Applicant be able to install all Units to enable a standard communication platform for MARTA,

(iv) each railcar type is manufactured by a different supplier. The applicant must have the ability to test the Units in each railcar type as the operation of each railcar type may provide different levels of noise or interference that could affect the operation of the Unit, and

(v) it is critical that the Applicant test each Unit, throughout the entire MARTA rail system, to determine whether it "bleeds" from one Unit to another, thereby creating intra-system interference. Having all Units installed will enable Applicant to provide the most accurate test results.

By increasing the number of allowable Units from 50 to 169, it will allow Applicant to make a more accurate and efficient determination of necessary operating power levels without increasing the likelihood of interference with a licensed broadcaster. The results from testing will be available immediately after all Units are installed and operated along the entire MARTA rail system.