



Ultra Electronics

ADVANCED TACTICAL SYSTEMS
4101 Smith School Road
Building IV, Suite 100
Austin
Texas 78744
USA

Tel: +1 512 327-6795
Fax: +1 512 327-8043

www.ultra-ats.com

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Reference number: 17733

Subject file: Dismissed-Without Prejudice, File No. 0606-EX-ST-2012

The above-referenced correspondence received from the Experimental Licensing Branch states that the Commission is unable to grant the application because *“the requested band does not adhere to the established 4 GHz channel plan in Chapter 4 of the NTIA manual and if the commercially available data link equipment is developed, the government agencies would not be able to use it.”*

We disagree with the reasoning stated in the dismissal correspondence. We think that the STA request should be re-considered.

1. We stated in our application that the equipment, which is manufactured by Cambium Networks as model number PTP45600, is not experimental. In addition, the PTP45600 has obtained stage 4 NTIA spectrum certification under docket number SPS-17231/4, signed by Mr. Butcher and Mr. Davidson on 10 February 2011, for some limited Department of Interior (National Park) locations.
2. Regarding the 4 GHz channel plan given in paragraph 4.3.18 of the NTIA manual, the equipment manufacturer states in their documentation that the PTP45600 operates in 10MHz (“D”), 20 MHz (“C”), and 40 MHz (“A”) channels. The 30 MHz (“B”) channels are left out because the PTP45600 tuning steps of 2 MHz do not allow the widest emission (28M7D1D) to align with any of the NTIA-defined “B” channels. Similarly, 9M57D1D does not align with the NTIA “D” channels, and so is designated to operate in “C” channels. With this in mind, the following lists the requested emission designators and how they would be assigned to NTIA-designated channels. Only one emission at a time is required.
 - 28M7D1D operates in channel A3, A4, or A5
 - 19M1D1D operates in one channel in the range C4-C10
 - 14M4D1D operates in one channel in the range C4-C10
 - 9M57D1D operates in one channel in the range C4-C10
 - 4M79D1D operates in one channel in the range D7-D20

3. STA is being requested as part of a GOVT project supporting Department of Homeland Security U.S. Customs and Border Protection Contract #: HSBP1012R0024

We hope that this provides sufficient information to justify reconsideration and approval of our STA request.

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V/r,

Kelly L. Welch

Contracts Manager

kelly.welch@ultra-ats.com

Tel: +1 512 327 6795 x213

Mobile: +1 254 319 5331

Cage Code: 0B9D8 DUNS Number: 18-106-4114

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