

Union Telephone Company

Application for Experimental Authority To Undertake Testing in the 3550 - 3650 MHz Band

Narrative Statement

Union Telephone Company ("Union") seeks an experimental authorization to continue its testing of Point-to-Multipoint ("P2MP") operations in the 3550 – 3650 MHz band. Union is an established telecommunications service provider, offering wireless and wireline service to its customers.

Union was granted Special Temporary Authority for the period July 16, 2018 to October 16, 2018. Call Sign WM9XXZ; File No. 1024-EX-ST-2018.

Union seeks to assess the propagation characteristics and real-world throughput of 3550 – 3650 MHz radios in the highly rural area of Wyoming, and neighboring states, where Union currently provides service.

Union holds a nationwide, non-exclusive license (WQTH550) to operate in the 3650 – 3700 MHz band, and Union has registered 10 links in this band. For testing, Union will re-tune equipment certified by the FCC to operate in the 3650 – 3700 MHz band so that such equipment can operate in the 3550 – 3650 MHz band. Union will comply with the power limits and out-of-band emission limits set forth in the Part 96 rules for Category B CBSDs.

Union will use existing towers to undertake its tests.

To the best of Union's knowledge, there are no ground-based radars in or near the planned trial area. In addition, FCC records show that there are no Fixed-Satellite Service earth stations operating in the 3600 – 3650 MHz band operating anywhere near the vicinity of the trial location(s).