

Application for Grant of Special Temporary Authority
File No. 0299-EX-ST-2016
Filed March 3, 2016
Vesper Marine, Applicant

SUPPLEMENTAL NARRATIVE EXPLANATION OF EXPERIMENTAL OPERATION

Further to the application referenced hereinabove, undersigned counsel has just been retained to consult with Vesper Marine, the applicant for Special Temporary Authority concerning this pending STA application. Some clarification of the purpose of the STA appears necessary. This is **not** a situation in which an applicant for a pending waiver in the Wireless Bureau (see, the Public Notice, DA 16-17, WT Docket No. 16-6 is seeking to deploy an uncertified Automatic Identification System (AIS) Aid to Navigation (AtoN) product in advance of adjudication of a pending waiver for that device on an open-ended basis.

Rather, the purpose of this STA is principally to permit a live, on-the-water demonstration to potential customers of this system, scheduled for May 9-12, 2016. The New York Power Authority has chartered a ship to take NYPA staff, mainstream NY and marine press, other companies who have an interest in the system, and commercial vessel operators out on the water for live demonstrations of the capabilities throughout that week. The inclusion of local commercial operators, such as tug boats operating out of NY Harbor & Long Island, is for the purpose of observing the deployment of the system, demonstrate how it enhances operations and safety, and providing advance training.

There will be three “stop-buzzer” contacts present at the event at all times:

- Steven Gloor, Vesper Marine US Representative, [858-405-5810](tel:858-405-5810) (the primary stop-buzzer contact)
- Robert Schwabe, Director Asset and Maintenance Management, New York Power Authority, [914-287-3794](tel:914-287-3794) (secondary stop-buzzer contact)
- Jeff Robbins, Vesper Marine CEO, 011 64 2 21 156 (who will also be present at all demonstrations)

There are other promotional events now scheduled. These are not demonstrations of the system, but follow-ons to the demonstrations for publicizing the results in media. The system will not be operated at these subsequent events. The Commission's rules regarding pre-certification marketing of RF devices will be complied with without exception.

The first is the International Cable Protection Committee (<https://www.iscpc.org/>) plenary April 12-14, 2016 whose theme is "*The Case for Submarine Cables: Protecting and enhancing the global environment with power and communications*". Robert Schwabe from New York Power Authority will be presenting the paper "*Integration of Virtual AIS Beacons and Asset Monitor to Prevent Anchoring Strikes*".

The second is the Offshore Technology May 2-5, 2016 in Houston where Vesper Marine will be presenting the use of its virtual AIS AtoN's for protecting subsea assets and the environment.

This presentation is introducing the New York Power Authority application to other potential customers within the oil & gas and telecommunications industries.

Therefore, the applicant would be satisfied with an STA that is limited to the dates May 5-13, 2016. Should the pending waiver request in WT Docket 16-6 be denied by the Wireless Bureau in the meantime for any reason, the STA will be deemed rescinded.

Should the applicant receive any complaint of interference from any licensee in any radio service, the demonstration will cease and not resume unless and until the interference is resolved to the satisfaction of the complainant(s).

Other than stop-buzzer contacts, questions can be directed to counsel for the applicant:

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