

Exhibit A – Narrative and Justification

Vivint Wireless received a Market Trial grant in May of 2018. The original grant included a unique special condition that it would not be renewed. However, at that time, it was conservatively expected that CBRS would be ready for commercial operations by the beginning of 2019. As of the date of this filing, commercial operations for CBRS have not yet begun and are not likely to begin for several months.

Vivint Wireless has encountered significant technology challenges that have hindered and delayed a robust deployment of a trial network. Specifically, hardware under test must satisfy certain minimum performance metrics to reasonably participate in a field trial with real-world end users and obtain relevant and actionable feedback. The available CBRS technology has not been sufficiently stable to meet this minimum performance threshold. As a result, Vivint Wireless has not had sufficient time to deploy and operate the trial network for a sustainable period of time necessary to evaluate the equipment and technology under stress and in dense, simulated real-world scenarios. These challenges have prevented Vivint Wireless and its partners from obtaining valuable insights from the market trial and from validating CBRS for competitive fixed wireless residential services. Vivint Wireless believes CBRS technology is now stable enough to proceed with a robust market trial, and Vivint Wireless seeks additional time to proceed with testing under its market trial authority.

In addition, given the delay in CBRS commercial operations and the technology challenges described above, Vivint Wireless will not be in a position to transition market trial participants from non-Part 96 certified equipment to certified Part 96 equipment under its current market trial grant. Vivint Wireless would like additional time to complete its market trial so that it can test equipment and prevent any service disruption by providing equipment replacements to market trial participants as equipment is transitioned.

For the foregoing reasons, Vivint respectfully requests that the Commission expeditiously grant the requested renewal of the existing experimental license for a period of 12 months. Such action will permit Vivint Wireless to complete a robust market trial to obtain the density to stress the equipment and technology for a sustainable period of time. The requested grant will allow Vivint Wireless sufficient time to test equipment and provide equipment replacements to market trial participants as equipment is transitioned to ensure continuity of service.