NARRATIVE STATEMENT

Pursuant to Section 5.3(a) and (e) and Section 5.61 of the Commission's rules, 47 C.F.R. §§ 5.3(a) & (e); 5.61 (2016), Walt Disney Imagineering Research & Development, Inc. ("Disney") hereby respectfully requests experimental special temporary authority ("STA") commencing July 20, 2017, to conduct proof-of-concept testing of ultra-wideband equipment authorized under FCC ID: NUF-P440-A for operation under Section 15.519 of the FCC's Rules, *Id.* at § 15.519. The proposed operations will be restricted to an area within Disney's premises at Anaheim, California.

In addition, Disney respectfully requests expedited treatment of this request so that it may commence tests on July 20, 2017. Justification for such action is attached separately in the "Request for Expedited Treatment" accompanying this application.

The following additional information is provided in support of this request:

1) **Applicant Information:**

   Walt Disney Imagineering Research & Development, Inc.
   1401 Flower St.
   Glendale, CA 91221
   Telephone: (818) 544-2172
   Facsimile: (818) 544-4565
   FCC Registration Number (FRN): 0008339962

2) **Need for STA:**
   Disney seeks an experimental STA to evaluate the functionality and acceptability of certain ultra-wideband ("UWB") devices that have received FCC equipment authorization under FCC ID: NUF-P440-A issued to TDC Acquisition Holdings Inc. That equipment has been authorized for operation under Section 15.519 of Part 15 of the FCC's rules, *id.* at § 15.519, and will not be modified for purposes of this test. Experimental authority is needed to permit Disney to evaluate an innovative deployment of such devices that involves their operation both on a mobile basis and at temporary fixed sites.

3) **Purpose of Operation:**
   Disney proposes to assess the capability of ultra-wideband technologies to support radiolocation requirements needed at its premises in Anaheim, California. It does not seek authority to conduct market studies or provide for-profit communications services under the requested experimental authority. The participants involved with the testing are employees of the company or personnel acting under the control of the company and will be advised that: (a) the operations are being conducted under an experimental authority issued to Walt Disney Imagineering Research & Development, Inc., (b) Disney is responsible for the experimental activities, (c) all operations are being conducted on a non-interference basis, and (d) after the test is completed, Disney will retrieve and recover all devices that do not comply with FCC regulations. Disney understands that the FCC may specify these as well as other conditions on its authorization.

4) **Spectrum Requested:**
Disney proposes to deploy equipment that has been authorized for operation under Part 15 of the FCC's rules in the frequency band 3272-5014 MHz. Disney's operations will be limited to the band 3300-5000 MHz.

5) **Equipment To Be Used:**
As noted above, Disney proposes to deploy ultra-wideband ("UWB") devices that have received FCC equipment authorization under FCC ID: NUF-P440-A issued to TDC Acquisition Holdings Inc. The equipment will be operated in compliance with the emissions limits set forth in Section 15.519 of Part 15 of the FCC's rules, *id.* at § 15.519, and will not be modified for purposes of this test.

6) **Technical Specifications:**
   a. No. of Test Units: ≤40
   b. Effective Radiated Power (ERP): ≤46 nanowatts
   c. Unmodulated Emission Designator: 17G0P0N
   d. Frequency Band: 3.3-5.0 GHz.
   e. Locations: Disney proposes to conduct proof-of-concept testing by placing not more than 35 devices at temporary fixed locations on its premises at Disneyland in Anaheim, California. Specifically, the temporary fixed test devices will be located within a radius of 1.5 kilometer of the coordinates 33-48-32N; 117-55-10W (NAD83 Datum). In addition, Disney proposes to deploy up to 5 mobile units that will operate within a radius of 1.5 kilometer of the temporary fixed locations. Not more than a total of 40 devices will be operated during the experimentation proposed in this request.

Disney will limit the power, test area, and deployment times to the minimum necessary to conduct its evaluations. Disney does not propose to supply station identification as set forth in Section 5.115 of the Commission's Rules during the experimentation.

7) **Restrictions on Operation:**
As described above, Disney does not propose to market, sell, or lease any equipment under the requested authority. All equipment will remain in Disney's possession and control during the experimentation and evaluation. If any different treatment becomes necessary during the course of its experimentation, Disney will seek separate and additional authority from the agency.

Disney recognizes that the operation of the devices under experimentation must not cause harmful interference to authorized facilities. To that end, the company will advise persons operating the equipment that permission to use the equipment has been granted under experimental authority issued to Disney, is strictly temporary and may be canceled at any time. The company will also advise operators of the condition that the equipment may not cause harmful interference.

Disney does not expect its proposed operation to cause harmful interference, however. As noted above, the experimentation will be restricted to its premises, and the devices will operate at ERP of less than 50 nanowatts. Moreover, in the unlikely event that Disney receives a complaint of harmful interference, it will take immediate action to address the interference, including if necessary discontinuing its operations. To facilitate such action, if needed, the company has designated Jeremy Mika, Show Software Developer Sr. to act as the "stop buzzer" for this test. That person's contact information is provided below.

8) Public Interest Statement:
Disney submits that issuance of experimental authority is in the public interest, convenience, and necessity. Grant of this application will permit Disney to conduct proof-of-concept testing of equipment needed to support its internal requirements for radiolocation capabilities.

9) Contact Information:

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