



WiLine Networks, Inc.
San Mateo, CA

Narrative Statement

Description of proposed experimental operations

WiLine Networks, Inc. (WiLine”), a provider of fixed wireless services for major markets in the United States, desires to develop and deploy systems for the delivery of efficient and cost effective high-speed internet access technologies to businesses and homes, utilizing radio spectrum in the 3650 – 3700 MHz band. To support this advanced system development, WiLine is required an authorization to conduct system performance and scalability trials in the Palo Alto, CA area, to determine actual system performance of new technology for high speed non-line of sight (“NLOS”) wireless broadband service, under signal propagation conditions typical in the area, as well as further understand relationship between theoretical performance predictions and actual system performance.

The objective of the system trial proposed herein is to determine the feasibility and optimum equipment configuration requirements for utilization of the 3650 to 3700 band to deploy high speed NLOS wireless data service to both indoor and outdoor installations, within Palo Alto, CA area, using Time Division Duplex (“TDD”) technology. Additionally, these system trials will help ascertain the interference impact of system transmissions on existing co-channel and adjacent channel Fixed Satellite Service (“FSS”) facilities. The results of these tests will be used to establish the minimum system parameters and hardware required to provide reliable, affordable high speed wireless data services without an adverse impact on existing FSS operations.

WiLine proposes to utilize 6 MHz-wide channels, utilizing Quadrature Amplitude Modulation with an EIRP not to exceed 37.8 dBm (6 watts). All transmission devices will be fixed and located within 20 km radius area. Primary base station and remote equipment for these trials will be PacketWave® system, developed by Aperto Networks and configured by the manufacturer for transmission in the 3650 MHz band. All base stations and remote devices utilized by WiLine for these tests will be professionally installed. They will operate in compliance with Part 15 and within the parameters and power levels adopted by the Commission on its Report and Order and Memorandum Opinion and Order, FCC 05-56. (ET Docket No. 04-151) adopted March 10, 2005 (“R&O”). Antenna data for the proposed system, as well as information provided by the manufacturer for the transmission equipment, is provided in an attached exhibit.

A detail interference analysis was compiled to assure protection of existing FSS earth stations and Federal Government operations in this band. A search of the IBFS database identified facilities in the 3650 – 3700 MHz band, located within 150 km of the proposed service area. This separation distance is the FSS protection zone radius, adopted in the R&O. The facilities proposed herein by WiLine have been designed to operate without causing interference to existing FSS earth stations and Federal Government operations in the 3650 – 3700 MHz band. In case that interference from these experimental operations occurs to existing authorized facilities, the tests will be suspended pending resolution of the interference.