



August 1, 2019

VIA ELECTRONIC FILING

Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Extension of Experimental Special Temporary Authorization (“STA”)
File Nos. 0177-EX-ST-2019, 1590-EX-ST-2018 & 1249-EX-ST-2018
Call Sign WM9XHE**

Wireless Everywhere LLC d/b/a Wave Wireless (“Wave Wireless”) respectfully seeks to extend its existing experimental special temporary authorization (“STA”) operations for six (6) months.¹ Currently, Wave Wireless has authority to test equipment and services in Citizens Broadband Radio Service (“CBRS”) spectrum from 3650-3700 MHz at two (2) indoor locations in Washington, DC.

Wave Wireless continues to successfully assess and validate the technical and commercial viability of certain Citizen Broadband Radio Service Devices (“CBSDs”) in the 3650-3700 MHz band at Station Location 2² in Washington, DC.

The extension of the *Wave Wireless STA* will ongoing permit testing and demonstrations at indoor facilities that supports enterprise clientele and future commercial deployment opportunities, including continuing to support an Initial Commercial Deployment (“ICD”) with a Spectrum Access System (“SAS”) partner. This extension will serve the public interest by allowing Wave Wireless and its partners to validate opportunities made available by CBRS spectrum sharing framework in real-world conditions using CBRS-compatible equipment. Furthermore, the trial will continue to demonstrate the capabilities of this innovative new spectrum sharing framework and promote practical implementation of CBRS spectrum in anticipation of CBRS commercialization by the end of 2019.

No information provided in support of the *Wave Wireless STA* is changing as a result of this change, except for the removal of Station Location 1. Wave Wireless will continue to adhere to the terms and conditions of the *Wave Wireless STA* and operate in compliance with the existing approved CBSD operating parameters. Moreover, Wave Wireless will continue to conduct testing in highly

¹ See Wireless Everywhere LLC d/b/a Wave Wireless, File Nos. 1590-EX-ST-2018, 1249-EX-ST-2018 & 0177-EX-ST-2019, Call Sign WM9XHE (expires on August 15, 2019) (“*Wave Wireless STA*”).

² Geographic coordinates: 38°52' 36.9” N, 77°00'23.3” W). Wave Wireless no longer seeks to conduct tests at Station Location 1 (38°54' 57.0” N, 77°02'46.0” W).



controlled field environments at power limits and out-of-band emission limits that comply with the Part 96 rules for Category A CBSDs and End User Devices.³

In anticipation of CBRS commercialization, continuing authorization to test is critical to allow Wave Wireless to further demonstrate the commercial opportunities associated with CBRS. At the conclusion of the experimental STA term, Wave Wireless will either transition to Part 96 GAA if the equipment is certified and authorized under GAA rules or will cease operations in 3650-3700 MHz band.

Given the low EIRP levels of the CBSDs and the enclosed trial environments, Wave Wireless anticipates no harmful interference to existing incumbent users operating in the 3650-3700 GHz band. As discussed, Wave Wireless has full access to the transmit locations and has personnel nearby to monitor construction and operation to ensure that there will be no harmful interference to incumbent users and to remedy harmful interference in the unlikely event it occurs. In any event, Wave Wireless agrees to accept interference from incumbent users and will immediately terminate its operations in the event it receives reports documenting harmful interference to other authorized spectrum users in the band. During the STA, requests to cease transmissions during the license term should be directed to: imranh@wavewireless.co.

Please do not hesitate to contact me with any questions regarding this matter.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Jason Davila", written over a horizontal line.

Jason Davila
General Counsel, Wave Wireless

³ See generally *Amendment of the Commission's Rules with Regard to Commercial Operations in the 3550–3650 MHz Band*, Report and Order and Second Further Notice of Proposed Rulemaking, GN Docket No. 12-354, ¶ 73 (2015) (“*CBRS Order*”); 47 C.F.R. § 96.41.