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ROBERT M. BOOTH, JR. (1911-1981)
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October 25, 1999

Via Facsimile and Hand Delivery
(202) 418-1918

Mr. Carl Huie
Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445-12th Street, S.W., Room 7-A361
Washington, D.C. 20554

Re: Pending STA Request for use of Certain
Frequencies at 1.7 GHz, 2.3 GHz and 4.5 GHz
at Winter Haven, Florida, November 1-7, 1999;
Wireless Video, Inc.

Dear Mr. Huie:

This will clarify, per our recent telephone discussion, certain aspects of the request for Special Temporary Authority (copy attached) on behalf of our client, Wireless Video, Inc.

You asked two questions specifically. First, why is it not possible to utilize Part 90 video channels at 2 GHz for this purpose, or an LTTS licensed facility under Part 101. Second, you asked whether this activity will be done on a for-profit basis.

The use of the requested microwave frequencies for video production purposes by our client is necessary because the event is a Bass Fishing Tournament, which is to be televised over national network television. The tournament is conducted on a large lake, and video will be shot and relayed over relatively long terrestrial paths from boats to relay points and to production trucks on shore at a central location. The numerous RF cameras necessary for the event require (1) low microwave frequencies due to the instability of the boats as transmission platforms and the need for broader beamwidth antennas, and (2) numerous channels due to the many tournament boats involved and the inability to reuse channels. There are only two channels available at 2 GHz under Part 90 in the IV Motion Picture Radio Service, and even with an

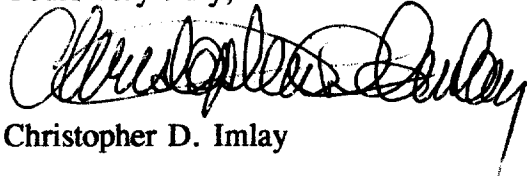
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LTTS license (an application for which is pending in the name of Wireless Video, but which has not yet been granted) there are insufficient frequencies available for the purpose in the range necessary for the path lengths to be crossed. Finally, **Wireless Video is not eligible for a Part 74 license** for use of the 2 GHz BAS channels because it is not a part 73 licensee, and even if it was eligible, other Part 73 licensees and networks will also be making use of those channels. Given all of the above, the request is for the minimum number of channels needed for the task.

Wireless Video is commercially engaged in video production activities, and its production of video is on behalf of a commercial customer. Therefore, the **use of these channels will be to facilitate a commercial activity**. It is not anticipated, however, that video coverage of such a tournament at this level will occur again in the foreseeable future, and therefore this event is somewhat unique.

Should there be other information required, you may rely on the availability of the undersigned.

Yours very truly,

A handwritten signature in black ink, appearing to read "Christopher D. Imlay", written over a horizontal line.

Christopher D. Imlay

cc: Mr. Greg Robinson