0187-EX-ST-1999

PATTON BOGGS LLP
ATTORNEYS AT LAW

2550 M Street, NW
Washington, DC 20037-1350
202-457-6000

Facsimile 202-457-6315

May 26, 1999

Janet Fitzpatrick
(202) 457-5668
jfitzpatrick@pattonboggs.com

VIA COURIER

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
Equipment Radio Services
P.O. Box 358320
Pittsburgh, PA 15251-5320

Re: Axonn Corporation
Request for Special Temporary Authority

Dear Ms. Salas:

Pursuant to Section 5.56 of the Commission's rules, enclosed please find an original and two paper copies of a request for Special Temporary Authority ("STA") in order to test equipment to operate in the 218.5-219 MHz frequency band. In accordance with Section 1.1103 of the Commission's rules, an FCC Form 159 and a check for the amount of $45.00 made payable to the Federal Communications Commission is also enclosed.

Please contact me at the number above if you have any questions regarding this filing.

Sincerely,

Janet Fitzpatrick

Janet Fitzpatrick

Enclosures

AXONN CORPORATION 101 West Robert E. Lee Boulevard • Suite 202 • New Orleans, Louisiana 70124 • (504) 282-8119 • FAX 282-0999

May 25, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
P.O. Box 358130
Pittsburgh, PA 15251-5130

ATTENTION: Carl Huie
Office of Engineering and Technology
Experimental Radio Branch

Pursuant to Section 5.56 of the Commission's Rules, (47 C.F.R. § 5.56), Axonn Corporation ("Axonn") hereby requests Special Temporary Authority ("STA") in order to test equipment to operate in the 218.5-219 MHz frequency band. Axonn provides the following information in support of its application.

1. Name/Address. The applicant's name is Axonn Corporation, located at 101 West Robert E. Lee Boulevard, Suite 404, New Orleans, Louisiana 70124. Axonn's telephone number is (504) 282-8119.

2. Need for Special Action.
Axonn is a radio engineering company currently designing equipment that operates in the 218-219 MHz band for digital telemetry applications. Axonn is requesting the STA in order to speed development time and facilitate testing of the 218-219 MHz equipment by allowing operation in its local area.
There currently is no television channel 13 station operating in the New Orleans, Louisiana Metropolitan Statistical Area ("MSA").

3. Type of Operation to be Conducted.
The current operation will be a one-way communication, although two-way communications are planned. The operation will include multiple, low duty-cycle, transmit-only and transceiver devices at fixed locations throughout the New Orleans, Louisiana MSA. These devices will broadcast short data bursts to a single centrally-located base station site. The transmit-only devices and transceivers will be located at approximately ground level and will transmit with an effective radiating power ("ERP") of less than 2 Watts.

The centrally located cell transmitter station ("CTS") site antennas will be located approximately 497 feet above ground level ("AGL") and will initially be receive-only. Once the two-way communication is implemented, this CTS site will transmit at an ERP of less than 20 Watts.

This operation will comply with current FCC Part 95, Subpart F Interactive Video and Data Service ("IVDS") regulations. 47C.F.R. Part 95.

4. Purpose of the Operation. The purpose of the operation is to test equipment designed for the 218-219 MHz band for private or commercial use. Axonn is in the process of developing equipment for potential applications which engage in one-way and two-way transmission of data in this spectrum which has largely remained unused since licenses were first granted by the FCC in 1993. Permitting this experimental use will hopefully remedy that situation by providing equipment that licensees could use to gather telemetry as a service to both business and residential customers within their license area. This telemetry data will be relayed from the CTS to a remote site via a modem and a telephone line.

5. Time and Date of Proposed Operation. Axon has scheduled tests to begin 1 June, 1999 subject to grant of the instant STA request. The testing will continue for a period of six months, or less if the testing results prove conclusive in less time. Axonn would reserve the right to request an extension of any STA in accordance with the Commission's rules.

6. Class of Station, Call Sign of Station, and Nature of Service. All equipment will be installed at fixed residential and commercial locations throughout the New Orleans, Louisiana MSA. Testing will not be conducted under any existing FCC call sign. Transmit-only and transceiver devices will be used to periodically send short bursts of digital telemetry information to the centrally located base station.

7. Location of Proposed Operation. Axonn intends to conduct tests in and around the New Orleans, Louisiana MSA. Transmit-only and transceiver devices will be placed at multiple fixed locations in the MSA, and the location of the CTS antenna is expected to be:

Latitude:	30 01 08
Longitude:	90 09 23
Street Address:	Lakeway 3 Plaza, 3838 N Causeway Blvd., Metairie, Louisiana, 70002

8. Equipment to be Used. The antennas that will be tentatively used at the CTS site are Decibel Products (manufacturer) ASP-7A (model number) antenna (unity gain antenna, 108-512 MHz). Additional antennas that might be used are currently being evaluated.

9. Frequencies Desired. 218.5-219 MHz. The 218-219 MHz frequency band is allocated to the 218-219 MHz service in two separate frequency blocks: 218.0-218.5 is designated as the A-Block frequencies and 218.5-219 MHz is designated as the B-Block frequencies. The B-Block frequencies within the New Orleans, Louisiana MSA are not currently assigned to any licensee. (See FCC Public Notice, Auction of Interactive Video and Data Service (IVDS), December 4, 1996, listing license for Market 29, New Orleans, as available for auction).

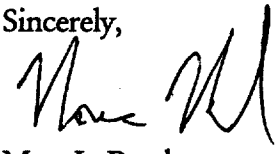
10. **Plate Power Input to Final Radio Frequency Stage.** Transmit-only and transceiver devices will radiate 2 Watts or less at the 218.5 MHz. The CTS will radiate 20 Watts or less after initial receive-only testing.

11. **Type of Emission.** All transmissions will utilize Frequency Modulation (FM) techniques and will use burst-mode transmission packets less than 20 msec in duration.

12. **Overall Height of Structure Above Ground.** The CTS antenna will be located approximately 497 feet above ground level, while the remote transmit only and transceiver devices will be at approximately ground level.

In accordance with Section 1.2002 of the Commissions Rules, Axonn certifies that it complies with the relevant provisions of the Anti-Drug Abuse Act of 1988.

Sincerely,



Marc L. Reed
Project Manager
Axonn Corporation

Axonn Corporation
Request for Experimental Special Temporary Authority (STA)
Exhibit 1

Description of Equipment/Service to be Tested

Axonn Corporation ("Axonn"), a radio engineering company, requests this STA in order to test equipment to operate in the 218.5-219 MHz frequency band for digital telemetry applications. Axonn is requesting the STA in order to speed development time and facilitate testing of the 218-219 MHz equipment by allowing operation in its local area.

The test will initially be a one-way communication from multiple low power response transmitter units ("RTUs") to a centrally located cell transmitter station ("CTS"), although Axonn requests authority to test two-way communications during the period of their STA. The operation will include multiple, low duty-cycle, transmit-only and transceiver devices at fixed locations throughout the New Orleans, Louisiana MSA. These devices will broadcast short data bursts (30 msec or less with 30 kHz bandwidth) to a single centrally-located base station site. The transmit-only devices and transceivers will be located at approximately ground level and will transmit with an effective radiating power ("ERP") of less than 2 Watts. The centrally located cell transmitter station ("CTS") site antennas will be located approximately 497 feet above ground level ("AGL") and will initially be receive-only. Once the two-way communication is implemented, the CTS site will transmit at an ERP of less than 20 Watts. All transmissions will utilize Frequency Modulation (FM) techniques and will use burst-mode transmission packets less than 30 msec in duration. This telemetry data will be relayed from the CTS to a remote site via a modem and a telephone line. This operation will comply with current FCC Part 95, Subpart F Interactive Video and Data Service ("IVDS") regulations. 47 C.F.R. Part 95. The system will be used for the site monitoring of commercial and residential properties. The RTUs, CTS, and modem connection will work in concert to form a closed loop radio telemetry application.

The antennas that will be tentatively used at the CTS site are Decibel Products Model ASP-7A with a unity gain antenna. Additional antennas that might be used are currently being evaluated. All equipment will be installed at fixed residential and commercial locations throughout the New Orleans, Louisiana Metropolitan Statistical Area ("MSA"). Axonn intends to conduct tests in and around the New Orleans, Louisiana MSA on the 218.5-219 MHz band, where there is currently no IVDS licensee. There is no Channel 13 television station within the New Orleans, Louisiana MSA. Transmit-only and transceiver devices will be placed at multiple fixed locations in the MSA, and the location of the CTS antenna is expected to be located at Lakeway 3 Plaza, 3838 N. Causeway Blvd., Metairie, Louisiana, 70002 (Latitude: 30 01 08; Longitude: 90 09 23).

Axonn has scheduled tests to begin 1 June, 1999 subject to grant of the instant STA request. The testing will continue for a period of six months, or less if the testing results prove conclusive in less time. Axonn would reserve the right to request an extension of any STA in accordance with the Commission's rules.

Grant of the instant application will allow Axonn to test equipment for use in the 218-219 MHz frequency band, which was licensed in 1993 and 1994 but has not been widely used. Thus, grant of this STA would further development of the equipment for use in the band, and is, therefore in the public interest.