



BellSouth Telecommunications, Inc.
Suite 3000
365 Canal Street
New Orleans, Louisiana 70130

504 528-7100
Fax 504 528-7556
Internet: Rudy.Christian2@bridge.bellsouth.com
E-Mail: Rudy.Christian/AL,BHRM08

R. (Rudy) Christian, Sr.
Network Vice President
Louisiana

November 18, 1999

**Federal Communications Commission
Experimental Radio Services
P.O. Box 358320
Pittsburgh, PA 15251-5320**

**In re: Request for Special Temporary Authority
BellSouth Telecommunications, Inc.**

Greetings:

On behalf of BellSouth Telecommunications, Inc. ("BST"), this letter is a request for special temporary authority ("STA") to operate certain equipment provided by Nortel Networks in the 3400-3500 MHz range for a period of no more than sixty (60) days commencing January 16, 2000, for the purpose of conducting radio frequency testing of the expected reliable coverage of the equipment in a dense urban environment, as outlined below.

In accordance with the provisions of section 5.61(c) of the Commission's rules, BST sets forth the following in response to the enumerated subsections of section 5.61(c).

- (1) The applicant's name, address, phone number, e-mail address and facsimile number are:

**BellSouth Telecommunications, Inc.
Attn: Cathy S. Forbes
675 W. Peachtree Street
Room 38L64
Atlanta, GA 30375
(404) 927-1437
(404) 885-9920 (facsimile)
Cathy.Forbes1@bridge.bellsouth.com**

(2) Description of why an STA is needed.

Special temporary authority is needed because the proposed operation is limited in duration to no more than sixty (60) days. In fact, the total number of days of actual operations, as described in subsection (3), will be less than sixty (60) days. BST believes this operation is not in conflict with the Commission's rules. Furthermore, BST will commit to termination of operations in the event such operations interfere with any properly authorized radio facility. However, it is BST's understanding that its proposed operations do not pose the risk of interference to any authorized radio facilities near the area of the proposed operations. Moreover, the equipment BST proposes to test is not type accepted by the Commission. It has been approved for operation in many other countries around the globe. Absent type acceptance in the United States, BST will need an STA to do its proposed radio frequency (RF) propagation tests.

The French Quarter is a historic district. The existing landline facilities in the French Quarter cannot continue to support current telecommunications demand and will not support future telecommunications demand absent substantial cable and conduit rehabilitation. Such rehabilitation would entail significant disruption to the commerce in the French Quarter and negatively impact tourism. Accordingly, BST is searching for viable alternatives to support the present and future needs of its customers in the French Quarter. The RF propagation tests proposed in this request would aid greatly in achieving a workable solution for meeting the service demands in the French Quarter.

(3) Description of the operation to be conducted and its purpose.

BST proposes to employ the Nortel Networks equipment described in subsection (7) for purposes of testing the expected radio propagation characteristics in a dense urban environment such as the French Quarter in downtown New Orleans. The proposed operations would be conducted at power levels that would be used in the event that commercial operations of such equipment one day are permitted by the Commission. BST proposes to use the base station(s) to generate RF at various power levels up to the maximum ERP set forth in subsection (9). BST will measure the signal levels received at different subscriber stations deployed in various structures throughout the French Quarter. BST will also use the subscriber stations to generate RF at various power levels up to the maximum ERP

set forth in subsection (9). Similarly, BST will measure the signal levels received at the base station(s). The reliability of the communications established between the base station(s) and the subscriber stations will be tested to determine the various power levels at which facsimile, data and telephony communications can be reliably maintained. The results of the initial tests will be analyzed to determine if supplemental testing will be needed during the time permitted under the STA, if such is granted.

- (4) Time and dates of proposed operation.

BST intends to initiate testing on or about January 16, 2000. The radio frequency (RF) testing will likely last no more than fourteen (14) days initially. After a short period of time to evaluate the results, BST, with Nortel Networks' assistance, may engage in a shorter period of testing to confirm the results of the initial tests. All operations will cease within sixty (60) days of January 16, 2000.

- (5) Class(es) of station (fixed, mobile, fixed and mobile) and call sign (if applicable).

The testing will utilize fixed facilities.
There is no call sign that is applicable to this testing.

- (6) Description of location(s) and, if applicable, geographical coordinates of the proposed operation.

Testing will be conducted in the French Quarter in downtown New Orleans, LA. The approximate coordinates for the proposed locations are:

Westin Canal Plaza	N 29° 57' 05.6" latitude
	W 90° 03' 55.5" longitude

Apartments	N 29° 57' 51.0" latitude
Frenchmen &	W 90° 03' 27.7" longitude
Royal	

Municipal Hall	N 29° 57' 42.3" latitude
(standby)	W 90° 04' 09.2" longitude

- (7) Equipment to be used, including name of manufacturer, model and number of units.

Nortel Networks Proximity I RBS (base stations) and RSS (subscriber stations)

- (8) Frequency(ies) desired.

Various channels, each with a bandwidth of 300 kHz, in the ranges:

Base stations: 3475.688 MHz to 3492.688 MHz

Subscriber stations: 3425.000 MHz to 3442.000 MHz

- (9) Maximum effective radiated power (ERP) or equivalently isotropically radiated power (EIRP).

The ERP for the base station(s) and the subscriber stations will be 45 dBm or 32 watts.

- (10) Emission designator or describe emission (bandwidth, modulation, etc.).

The emission designator for the base station and the subscriber station is Q7W to accommodate facsimile, data and telephony transmissions.

- (11) Overall height of the antenna structures above the ground.

Westin Canal Plaza 140 meters

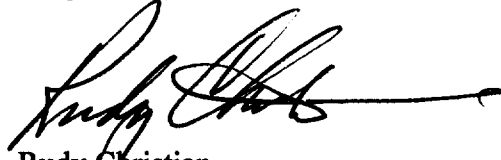
Apartments 35.5 meters
Frenchmen &
Royal

Municipal Hall 28.0 meters
(standby)

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Based on the foregoing, it is respectfully submitted that the public interest will be served by grant of the instant request for special temporary authority as described above. If there are any questions concerning the instant application, please contact the undersigned or Ben G. Almond, Vice President-Federal Regulatory, BellSouth DC, Inc., 1133 21st Street, N.W., Suite 900, Washington DC 20036, telephone (202) 463-4112, facsimile (202) 463-4195.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rudy Christian", with a long horizontal flourish extending to the right.

Rudy Christian
Network Vice President - Louisiana

cc: Mr. Carl Huie
Mr. Doug Young