

PUBLIC INTEREST STATEMENT

1. Introduction

By the instant request ("STA Request"), General Dynamics Armament and Technical Products, Inc. ("GDATP") requests that the Commission grant to GDATP Special Temporary Authority ("STA") to operate the facilities (the "Facilities") specified in the instant STA Request. ***Due to the urgent near-term requirements associated with the requested testing, under separate cover a request for expedited processing is being submitted by GDATP in order to permit commencement of testing by September 12, 2008.***

2. Purpose and Nature of the Operation

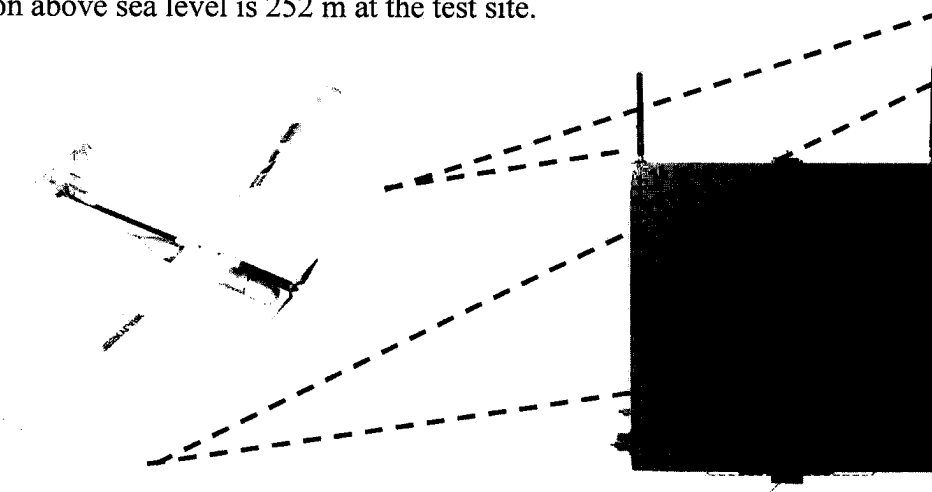
The testing specified in this STA Request will be conducted by General Dynamics Armament and Technical Products (GDATP), a business unit of General Dynamics. The purpose of this experiment is to assist in the rapid development, testing, and demonstration to key representatives of the U.S. Armed Forces of state-of-the-art unmanned aerial surveillance technologies. Transmissions will originate from the ground and the air, as follows:

Ground-Based Transmissions:

Originating from a laptop/consul/tripod configuration, located at temporary-fixed locations within a 1 km radius around the centerpoint coordinates of: 44-28-42 N.Lat.; 072-56-57 W.Long. (NAD 83) ("Centerpoint Coordinates") (Centerpoint Coordinates located at Ethan Allen Firing Range in Jericho, VT)

Airborne Transmissions:

Mobile airborne transmissions originating from an unmanned aerial surveillance aircraft, within a 7 km radius around the Centerpoint Coordinates. Maximum flight planned is 1219.2 m above ground level. The firing range air space is controlled by Burlington International airport, which - line of site - is 15.7 km away from the firing range. Ground elevation above sea level is 252 m at the test site.



3. Stop Buzzer – GDATP hereby advises that Mr. Richard Scheps will be available by wireless telephone at (802) 318-6561 and will act as a "stop buzzer" if any issues regarding interference arise during testing

4. Directionality of Antennas

The Antenna Registration for the ground-based transmissions specifies “Yes” in response to the question: “Is a directional antenna used?”. This is to clarify that for such ground-based transmissions, one of 3 different antennas may be used. Of those three potential antennas, only one is directional. Such directional antenna is characterized by the following:

Gain (Nominal)	Width of Beam in Degrees at half-power point	Orientation in Vertical Plane	Orientation in Horizontal Plane
+18dBi	16° in Horizontal Plane 15° in Vertical Plane	0-90°	360°

5. Reason for STA Request; and Request for Expedited Processing and Grant

Under separate cover, GDATP has requested expedited processing of this STA Request, in order to permit GDATP to operate the facilities specified in the STA Request commencing September 12, 2008. Because the period of testing is currently anticipated to be six months or less, an STA is the appropriate vehicle for such authority.

As explained in the attached cover letter, expedited processing and grant of the STA Request is in the public interest for the following reasons:

- Urgent Military Need for Development of UAV/UAS Technology. The subject experiment represents a unique opportunity for rapid development, testing, and demonstration to key representatives of the U.S. Armed Forces of state-of-the-art unmanned aerial surveillance technologies. This effort represents a cooperative effort between GDATP and the U.S. Army’s Ft. Benning Infantry Battle Lab, and responds directly to Defense Secretary Gates’ recent comments seeking more rapid deployment of such surveillance technologies.¹ This cooperative effort is consistent with Secretary Gates’ UAV initiatives, including his establishment of a new UAV task force. Id. The goal of this testing is to provide persistent, responsive battlefield surveillance at small unit echelons, and thereby provide warfighters the timely information they need to mitigate battlefield threats and reduce American casualties.
- Full Cooperation with Ft. Benning Infantry Battle Lab and Yuma Proving Ground Personnel. The near-term testing under this STA is fully supported by the U.S Army’s Ft. Benning Infantry Battle Lab and Yuma Proving Ground personnel. As an initial matter, GDATP’s involvement in this experiment is the result of its participation in a cooperative U.S. Army/industry experiment sponsored by the Ft. Benning Infantry Battle Lab. In addition, Yuma Proving Ground personnel will be observing the tests at the Ethan Allen Firing Range for the purpose of preparing a safety report, which must be completed prior to October 15, 2008. In order to timely complete the safety report, the safety assessment must be completed no later than September 23, 2008. This safety report is a condition precedent to the performance of subsequent full-scale tests at Ft. Benning next month. Equipment and personnel in support of these tests will be arriving at the Ethan Allen Firing Range from

¹ Defense News, Published April 21, 2008 (<http://www.defensenews.com/story.php?i=3490138>).

overseas in a matter of days. Accordingly, to meet these timetables, STA is required by September 12, 2008.

- Near-Term Grant Required Due to Presence of High-Level Military Personnel. As explained above, the near-term grant of the STA by September 12, 2008, is necessary because numerous personnel from Yuma Proving Ground will be observing the tests for the purpose of preparing a safety report, which must be completed prior to October 15, 2008. In order to timely complete the safety report, the safety assessment must be completed no later than September 23, 2008. A six (6) month STA (9/12/08-3/12/09) is required due to the need for continued follow-on training of military personnel operating this technology.
- Extremely Limited Scope of Experiment

Expeditious processing of this STA Request should be assisted due to the extremely limited scope of the experiment. Specifically:

- Authority is requested for only limited and sporadic operation of the facilities during the authorized timeframe. Specifically, operation of the facilities will occur only from approximately 7am-4 pm (ET). In addition, during those hours, operation will be sporadic, not continuous. Training flights are envisioned to be only approximately 2 hours each.
- AFTRCC coordination is being conducted and the results of such coordination will be provided to the Commission promptly upon completion.
- If necessary, GDATP can blank out any problem frequencies within the requested band of operation. In addition, GDATP only requires one 4 MHz channel to be active at any given time, from the following list of frequencies: 2362 MHz, 2366 MHz, 2370 MHz, 2374 MHz, 2378 MHz, 2382 MHz, 2386 MHz, 2390 MHz, 2394 MHz, 2398 MHz, 2302 MHz, 2314 MHz, 2322 MHz, 2334 MHz, 2348 MHz, 2354 MHz.

GDATP is well aware that requests to expedite processing and grant of experimental applications such as this STA Request place additional requirements on the Commission's already strained resources. For that reason, GDATP submits expedite requests only in the most urgent circumstances and where no other alternative exists. For the reasons set forth above, GDATP has demonstrated the urgent need for expedited processing in this particular case. GDATP greatly appreciates the Commission's attention to this matter.

For the foregoing reasons, approval of this STA Request on an expedited basis is in the public interest, convenience and necessity.