

EXHIBIT — QUESTION 7: PURPOSE OF EXPERIMENT*Narrative Statement Pursuant to 47 C.F.R. § 5.63(c)(1)*

Applicant	KMB Telematics Inc.
Address	1601 Connecticut Avenue NW, Suite 301, Washington, DC 20009-1076
FCC Registration Number	0030628945
Application	FCC Form 442, Application for New Experimental Radio Station Authorization
Equipment	KMB Traverse 60™, P/N SX35K
Date	August 6, 2026

1. Introduction and Summary

KMB Telematics Inc. (“Applicant”) requests a conventional experimental radio license under Part 5 of the Commission’s Rules to conduct a program of research and experimentation characterizing the performance of a ground-based millimeter-wave radiolocation sensor against calibrated low-radar-cross-section airborne targets.

The program will establish by measurement the detection probability, angular estimation accuracy, and target track quality achievable by the KMB Traverse 60™ in operational terrain, clutter, and precipitation conditions. Numerical performance thresholds drawn from published consensus standards for airborne target surveillance — RTCA DO-381 and ASTM F3442 — are adopted as reference values against which the measured results are assessed, the standards being the principal published sources of quantitative performance figures for sensors of this class.

Applicant requests authority to operate within the 24.05–24.25 GHz radiolocation band, with a maximum occupied bandwidth of 60 MHz, tunable within that band as described in Section 7 and subject to a self-imposed lower center-frequency limit of 24.08 GHz for the protection of the adjacent passive band. Applicant requests authorization for fixed stations at the three sites identified in Section 8, in Maryland, Texas, and California, each operated as a fixed station. Applicant requests a license term of 24 months.

2. Applicant

KMB Telematics Inc. is a Delaware corporation headquartered in Washington DC, engaged in the design and manufacture of millimeter-wave radar sensors.

The program of experimentation described herein is not being conducted under contract to any agency of the United States Government, and the equipment is not being developed for the sole purpose of export to a foreign government.

3. Equipment Description and Theory of Operation

3.1 Physical and Electrical Description

The Traverse 60™ (P/N SX35K) is a self-contained, ruggedized radiolocation sensor measuring 113 cm × 37 cm × 14 cm and weighing 41 kg, rated to IP67 and to an operating temperature range of -25 °C to +50 °C. The unit accepts 28 VDC input and draws 1420 W peak in operation. It presents a 2.5G Ethernet interface for data output.

3.2 Theory of Operation

The Traverse 60™ is a frequency-modulated continuous-wave ("FMCW") radar. The transmitter sweeps a linear frequency chirp across a 60 MHz bandwidth. Returns are mixed with a replica of the transmitted chirp and digitized, yielding range from the beat frequency and radial velocity from coherent processing across successive chirps.

Angular information is obtained from a multi-channel receive array. The sensor produces complete three-dimensional data frames at a fixed frame rate, and outputs both a high-bandwidth volumetric product (reflectivity and radial velocity) and a low-bandwidth target track product suitable for cueing other sensors. The angular accuracy and resolution attained are among the quantities the program is designed to establish by measurement, per Section 5.

Transmission is through a horizontally polarized transmit aperture giving 31 dBi gain. The antenna apertures, element types, beamwidths, and pattern data are included in the Confidential Technical Annex. Requested transmit parameters for this experimentation program are summarized in Section 8.

3.3 Transmitted Waveform Parameters

The transmit chain comprises a frequency synthesizer, power amplifier, and transmit filtering feeding the transmit aperture. The filtering suppresses unwanted emissions to the levels committed in Section 9. Its configuration is described in the Confidential Technical Annex. The transmitted waveform is a linear sawtooth chirp. Its timing is given in the Confidential Technical Annex. The frequency excursion is confined to the authorized bandwidth throughout the sweep, including the retrace interval.

4. Program of Research and Experimentation

The experimental program consists of five phases, to be conducted sequentially at one or more of the location(s) identified in the application.

Phase 1 — Site Characterization, Emission Verification, and Calibration

Establish the radar at the test site and characterize both the equipment and the site's ambient environment prior to any performance testing. Activities include:

1. Passive spectrum survey of the 23.6–24.65 GHz range to establish the noise and interference floor at the site and to identify any incumbent activity.

2. Verification of the transmitted spectrum against the authorized bandwidth, including measurement of out-of-band and spurious emissions across the range specified in 47 C.F.R. § 2.1057. This will be performed at reduced power and into a load or absorber where practicable before any full-power radiated operation.
3. Confirmation that emissions falling within the 23.6–24.0 GHz passive band are attenuated to the levels stated in the accompanying interference analysis exhibit.
4. Boresight alignment and angular calibration against a surveyed corner reflector at known azimuth, elevation, and range, together with measurement of the transmit antenna pattern to confirm the sidelobe levels relied upon in the accompanying interference analysis exhibit.
5. Measurement of ground and terrain clutter returns across the sensor's field of regard.

This phase establishes the measurement baseline for all subsequent results and confirms that the emission characteristics predicted in the accompanying exhibits are met in the delivered hardware.

Phase 2 — Detection Range Characterization

Quantify probability of detection as a function of range and target radar cross section. Calibrated RCS references will be flown on cooperative UAS platforms and positioned on fixed masts at surveyed ranges, producing detection statistics against controlled targets. Testing will extend beyond the predicted maximum detection ranges to characterize the roll-off region. The measured quantity is $P(\text{detection})$ as a function of slant range, RCS, aspect angle, and elevation angle relative to the ground plane. The goal is to obtain sufficient trial counts to establish the 95% confidence intervals the reference standards require.

Phase 3 — Angular Accuracy Characterization

Quantify azimuth and elevation angular estimation error against truth. Cooperative target aircraft carrying GNSS receivers will fly radial, tangential, and oblique profiles spanning the full field of view in both axes, providing independent position truth against which radar angle estimates are compared. The measured quantity is the angular error distribution as a function of signal-to-noise ratio, off-boresight angle, and target dynamics, together with the resulting cross-range position error at operationally relevant ranges.

Phase 4 — Track Performance and Angular Rate Accuracy

Quantify the performance of the sensor's tracker, as distinct from the underlying detection and angle-estimation performance. Activities include measurement of probability of track $P(\text{track})$ and track continuity across the surveillance envelope, measurement of track initiation latency and the time required for angular rate estimates to converge following track initiation, measurement of angular rate accuracy at the tracker output, measurement of range error as a percentage of true range, and characterization of tracker behavior in multi-target geometries, including closely spaced targets and crossing tracks.

Phase 5 — Degraded Weather Performance

Quantify the degradation of the results obtained in Phases 2 through 4 under precipitation. Where naturally occurring rainfall of characterized rate is available during the license term, detection and tracking trials will be repeated with concurrent disdrometer or calibrated rain-gauge measurement of rate.

5. Specific Objectives

The specific objectives are to establish the following performance quantities, and to compare to the published reference standards:

1. Position error throughout a surveillance volume, referenced against the RTCA DO-381 figures of ± 175 m horizontal and ± 105 m vertical at 95% confidence, verified in 4 mm/hr rain.
2. Angular rate accuracy at the tracker output as a function of track maturation time, probability of track across the surveillance envelope, and range error as a percentage of true range, referenced against the ASTM F3442 Appendix X1 figures of 0.1–0.5°/s angular rate accuracy, $P(\text{track}) \geq 95\%$, and range error within 15%.
3. Across both, the sensitivity of these results to elevation angle, ground clutter and multipath, target aspect, target velocity, RCS fluctuation, and precipitation rate.

6. Contribution to the Development of the Radio Art

Ground-based millimeter-wave surveillance of low-radar-cross-section airborne targets is a recent application for which published performance standards, including DO-381 and F3442, remain under active development. The program contributes to the development of the radio art as follows:

1. The published standards specify required performance but do not establish what is achievable in practice from a ground-based millimeter-wave sensor in real terrain, clutter, and weather. Measurement data against calibrated low-RCS airborne targets is limited, and what exists is drawn largely from simulation or from airborne rather than ground-based geometries.
2. The mapping from raw sensor performance to tracker-level performance — in particular the track maturation dynamics governing how quickly angular rate estimates converge — is not well established in the literature and must be measured.

7. Frequency Justification

Applicant requests authority to operate within 24.05–24.25 GHz. In the United States Table of Frequency Allocations, that band is allocated to the radiolocation service on a primary basis for Federal use and on a secondary basis for non-Federal use, together with a secondary non-Federal amateur allocation and a secondary Earth exploration-satellite (active) allocation. Footnote US110 provides that in this band the non-Federal radiolocation service is secondary to the Government radiolocation service. The band is additionally designated for industrial, scientific and medical applications under footnote 5.150.

Applicant is a non-Federal applicant and its proposed operation is a non-Federal radiolocation use. Applicant therefore seeks authority on a secondary basis, and acknowledges that it may not cause harmful interference to, and must accept interference from, Federal radiolocation operations in the band, as well as any other primary operations. The operational measures set out in Section 9 are undertaken in discharge of that obligation. Applicant further acknowledges that this band is used by Federal radiolocation systems and that grant may be conditioned on coordination through the National Telecommunications and Information Administration. Applicant will comply with any such condition.

Characterization of the proposed use as radiolocation

Radiolocation is defined at 47 C.F.R. § 2.1 as radiodetermination used for purposes other than those of radionavigation, radionavigation being radiodetermination used for the purposes of navigation, including obstruction warning. The proposed use falls on the radiolocation side of that line.

Throughout the program of experimentation, the sensor provides no navigation function to any aircraft. No aircraft, crewed or uncrewed, will rely on its output for separation, avoidance, or navigation during the license term. The cooperative target aircraft described in Section 4 carry GNSS receivers which supply independent position truth. The radar output is compared against that truth rather than used to navigate. The sensor is the subject of measurement, not a source of navigation information, and the product of the program is characterization data rather than a navigation service. The use is accordingly radiodetermination for a purpose other than navigation, and the requested band is allocated to the radiolocation service.

Why this band and bandwidth

Angular accuracy is the binding constraint. Angular resolution for a given aperture scales with wavelength, so the angular estimation accuracy referenced in Section 5 with a compact, easily deployable aperture requires millimeter-wave operation. Specific attenuation from atmospheric absorption and precipitation rises steeply with frequency, which would compromise the rain-margin requirement the same standards impose. The 24 GHz radiolocation allocation is the lowest millimeter-wave radiolocation band satisfying the aperture-versus-accuracy constraint while retaining acceptable propagation margin in precipitation.

The 60 MHz occupied bandwidth follows from the range resolution requirement of the program, per the relationship $\Delta R = c/2B$. Range resolution governs separation of closely spaced targets and rejection of clutter within the resolution cell, both bearing directly on the $P(\text{track})$ and range-error quantities identified in Section 5.

Why tunability within the band is requested

Applicant requests that the authorization specify the frequency range 24.05–24.25 GHz with a maximum occupied bandwidth of 60 MHz to enable interference avoidance. As a secondary user in a band designated for industrial, scientific and medical applications under footnote 5.150 and hosting Part 15 field disturbance sensors, the ability to select a center frequency clear of activity identified during the Phase 1 site survey is Applicant's principal means of avoiding both causing and receiving interference.

Preferred operating frequencies

Applicant's preferred center frequency is 24.20 GHz, placing the occupied emission at 24.17–24.23 GHz. That choice is made for two reasons. It is the segment of the requested range furthest removed from the 23.6–24.0 GHz passive band, and the occupied emission avoids both of the spot frequencies designated for radiolocation devices in this band¹ around which the density of incumbent device activity, including Federal devices operating on a primary basis relative to Applicant, is expected to be highest. Applicant notes that § 90.103 also designates 24.20–24.25 GHz for certain non-Federal NON-emission devices; those operations are co-secondary with Applicant's, and the pre-operation site survey described in Section 9 addresses them at each location.

Applicant operates a single unit and will therefore employ a single center frequency at any given time. Where the Phase 1 site survey identifies activity that cannot be avoided at 24.20 GHz, the alternative center frequency will be 24.08 GHz, placing that emission at 24.05–24.11 GHz. The transmit filtering described in Section 9 is dimensioned for the preferred center frequency. A change of center frequency within the authorized band would be accompanied by a corresponding change of filter, which is an equipment change within the authorized envelope rather than a change to the authorization.

Applicant will confine all emissions within 24.05–24.25 GHz.

Protection of the adjacent passive band

Applicant does not request, and will not operate on, any frequency allocated to the passive services. The 23.6–24.0 GHz band is allocated to the Earth exploration-satellite (passive), radio astronomy, and space research (passive) services and is subject to footnote 5.340, under which all emissions are prohibited.

Although the requested authorization extends to the lower edge of the radiolocation allocation at 24.05 GHz, Applicant commits as an operational matter to employ no center frequency below 24.08 GHz. At the maximum requested occupied bandwidth of 60 MHz, that limit places the lower edge of the occupied emission at or above 24.05 GHz, maintaining a minimum separation of 50 MHz between the occupied emission and the upper edge of the passive band. At Applicant's preferred center frequency of 24.20 GHz, the separation is 170 MHz. Applicant will operate at the highest center frequency consistent with the interference environment identified in the Phase 1 site survey, and will treat the 24.08 GHz limit as a floor rather than a preferred operating point.

Attenuation of out-of-band and spurious emissions falling within 23.6–24.0 GHz is addressed quantitatively in the accompanying interference analysis exhibit. Confirmation of that attenuation by measurement is a prerequisite to full-power operation under Phase 1, as described in Section 4.

8. Requested Technical Parameters

Parameter	Requested value
Frequency range of operation	24.05–24.25 GHz

¹The frequency 24.150 MHz is provided for Federal devices under § 7.22 of the NTIA Manual, and 24.125 MHz is designated for non-Federal continuous-wave devices under 47 C.F.R. § 90.103.

Parameter	Requested value
Maximum occupied / authorized bandwidth	60 MHz
Center frequency	24.20 GHz preferred; selectable within the requested range subject to a lower limit of 24.08 GHz (Section 7); single center frequency per unit at any given time
Emission designator	60M0F3N
Modulation	Linear FMCW chirp
Maximum transmitter output power	100 W at the antenna input port
Reduced-power operating mode	1 W at the antenna port, for ground-referenced calibration and clutter characterization at 0° elevation (Section 9)
Antenna	Directional. Type, aperture, and pattern data described in the Confidential Technical Annex
Antenna gain	31 dBi at 24.2 GHz
Maximum EIRP	81 dBm (126 kW)
Duty cycle	Continuous
Polarization	Horizontal
Antenna beamwidth	Confidential Technical Annex
Antenna centerline height above ground	2–3 m
Elevation sector of operation	0° to +45° above horizon (all sites)
Station class	Fixed
Site 1 coordinates	38.98592° N, 76.67069° W (Anne Arundel County, Maryland)
Site 1 azimuth sector	All azimuths except 307° to 347° true; power reduced 10 dB within 287° to 007° true (see Section 9)
Site 2 coordinates	33.04687° N, 97.29396° W (Denton County, Texas)
Site 2 azimuth sector	Unrestricted
Site 3 coordinates	34.62347° N, 117.54195° W (San Bernardino County, California)
Site 3 azimuth sector	Unrestricted
Number of units	1

Power reference plane. The 100 W figure is stated at the antenna input port, downstream of the transmit filtering and feed, and is requested as the authorized envelope. Realized power will be lower by the insertion loss of the filters and feed. All exposure and interference analyses accompanying this application are computed at the envelope value of 81 dBm EIRP rather than the expected realized value, and are therefore conservative.

Site selection. Applicant requests fixed operation at the three sites identified above. The three present materially different terrain, clutter, and airspace environments: a developed mid-Atlantic setting, a

north Texas setting, and an arid high-desert setting with markedly lower ground clutter. Access to sites of differing character is desired in order to establish the sensitivity of the measured results to terrain and clutter environment, which is among the cross-cutting objectives stated in Section 5, and the availability of cooperative target aircraft and of suitable airspace varies between sites. Applicant will observe the pre-operation site survey, azimuth, power, and exposure controls described in Section 9 at every site.

Operation at 0° elevation is required by the experimental program for boresight alignment and angular calibration against surveyed reference targets of known radar cross section placed on the ground at surveyed ranges, and terrain clutter characterization requires measurement of returns from the ground plane itself. Neither can be accomplished with the main beam directed above the horizon. The exposure controls associated with low-elevation operation are described in Section 9.

9. Interference Avoidance and Operational Control

Applicant operates as a secondary user in this band, as described in Section 7. Applicant will accordingly not cause harmful interference to Federal radiolocation operations or to any other primary operations, will accept any interference received from them, and will cease transmissions immediately upon detection or notification of harmful interference to any station operating in accordance with the Table of Frequency Allocations. This is consistent with the obligations imposed by 47 C.F.R. §§ 5.84 and 5.111 and with footnote US110. The following measures are undertaken in discharge of those obligations, and the supporting analysis is provided in the accompanying interference analysis exhibit:

Spectrum survey before operation. As described in Phase 1, Applicant will conduct a passive spectrum survey of the site prior to any transmission, will select a center frequency clear of detected activity, and will not commence operation if activity is detected that the requested operation could disturb and that cannot be avoided by frequency selection. Given Applicant's secondary status, the survey is repeated at each new deployment location rather than performed once.

Power management by elevation angle. Applicant will operate in two distinct power modes. Ground-referenced activities conducted at or near 0° elevation (boresight alignment, angular calibration against surveyed reference targets, and terrain clutter characterization) will be performed at the reduced power specified in Section 8, which is sufficient for those measurements because of the close range of the reference targets. Full transmitter power will be employed only for detection, angular accuracy, and tracking measurements against airborne targets, for which the main beam is directed above the horizon. This arrangement confines the great majority of full-power operating time to elevation angles at which the main beam clears terrestrial receivers and occupied areas.

Controlled perimeter for low-elevation operation. Where full-power operation is conducted at any elevation angle below 10°, Applicant will establish and maintain a controlled perimeter of not less than 40 m radius about the antenna; the basis for the 10° threshold is set out in the accompanying RF exposure exhibit. Because azimuth is unrestricted apart from the Site 1 keep-out sector, the perimeter is a full circle rather than a sector, enclosing approximately 5,030 m². Site selection at each location will

account for that requirement. The perimeter will be physically delineated, posted with radiofrequency hazard signage conforming to ANSI C95.2, and closed to the general public. Reference targets will be positioned and any personnel withdrawn beyond the perimeter before transmission commences; no personnel will be present within the perimeter while the transmitter is energized at full power below 10° elevation, and irrespective of power mode or elevation no person will approach within 10 m of the antenna while it is energized.

Basis for the perimeter radius. At the requested envelope of 81 dBm EIRP the general-population exposure boundary under 47 C.F.R. § 1.1310 lies at approximately 31.7 m on boresight and the occupational boundary at approximately 14.2 m, both well beyond the far-field boundary of the aperture. The 40 m perimeter provides margin for pointing tolerance, azimuth slewing, and the time-averaging basis of the limits. The calculation, including the basis for not applying the OET Bulletin 65 ground-reflection allowance, is set out in the accompanying RF exposure exhibit.

Azimuth of operation. Applicant requests unrestricted azimuth at all three sites, other than a keep-out sector of 307° to 347° true at Site 1 and a reduced-power sector of 287° to 007° true at the same site, both established for the protection of the Commission's monitoring facility at Laurel, Maryland, as described below. Azimuth freedom is required by the experimental program to allow performance characterization throughout the search volume.

Commission monitoring facilities — method. Under 47 C.F.R. § 5.85(f)(2), the threshold for coordination is a calculated direct-wave fundamental field strength exceeding 10 mV/m in the authorized bandwidth at the reference coordinates of a Commission monitoring facility, equivalent to a power flux density of -65.8 dBW/m². At the requested envelope of 81 dBm EIRP, free-space propagation yields that power flux density at a range of approximately 195 km. Any facility beyond that range is therefore below the § 5.85(f)(2) threshold on boresight, at any azimuth, before any allowance for atmospheric absorption or terrain loss — both of which are substantial at 24 GHz over paths of this length. Applicant has evaluated each facility listed in § 0.121(b) in the vicinity of each site on that basis:

Site	Facility coordinates	Distance	Boresight pfd	Result
Site 1 (MD)	39° 09' 54.4" N, 76° 49' 15.9" W (Laurel, MD)	23.8 km	-47.5 dBW/m ²	Exceeds threshold, azimuth restricted
Site 2 (TX)	27° 26' 30.1" N, 97° 53' 01.0" W	626 km	-76.9 dBW/m ²	11.1 dB below threshold
Site 3 (CA)	37° 43' 29.7" N, 121° 45' 15.8" W	512 km	-75.2 dBW/m ²	9.4 dB below threshold
Site 3 (CA)	31° 30' 02.3" N, 109° 39' 14.3" W	814 km	-79.2 dBW/m ²	13.4 dB below threshold

Site 1 azimuth and power restriction. The Laurel facility bears 327° true from Site 1 at approximately 23.8 km, at which range the boresight power flux density of -47.5 dBW/m² exceeds the § 5.85(f)(2) threshold by approximately 18.3 dB. Applicant therefore restricts operation at Site 1 rather than relying on propagation or terrain arguments, and adopts two measures in combination:

1. No transmission at any azimuth within the sector 307° to 347° true, placing the facility not less than 20° off boresight at all times.

2. Transmitter power reduced by not less than 10 dB whenever the beam is directed within 40° of the bearing to the facility, that is, throughout the sector 287° to 007° true.

At 20° off boresight the antenna pattern provides discrimination of not less than 40 dB relative to peak (see Confidential Technical Annex) well beyond the 18.3 dB required. The additional power reduction across the wider sector is adopted because the pattern data is simulated rather than measured, and because gain and sidelobe structure will vary across the band. Applicant will confirm this showing against the measured pattern during Phase 1, will adjust the restricted sectors if it so requires, and will coordinate with the Commission on request.

Sites 2 and 3. No azimuth restriction is required at Site 2 or Site 3, each listed facility being well beyond the 195 km range at which the § 5.85(f)(2) threshold could be approached at the requested envelope EIRP. Applicant has identified no other Commission facility within that range of any of the three sites.

Horizon-limited footprint at low elevation. At an antenna centerline of 2–3 m, the radio horizon is approximately 6.5 km against a receiver at ground level, extending to roughly 20 km against a receiver at a 10 m height. Terrestrial interference potential during 0° elevation operation is accordingly limited by path geometry as well as by radiated power at all three sites. Interference potential toward space-based receivers, including the passive sensors the 23.6–24.0 GHz allocation protects, arises predominantly at the upper end of the requested elevation sector and is independent of azimuth. The quantitative analysis in the accompanying interference analysis exhibit is performed at the 45° elevation limit for that reason.

Out-of-band emission control. Transmitted emissions will be confined to the authorized bandwidth. Filtering within the transmit chain will attenuate emissions falling into the 23.6–24.0 GHz passive band by not less than 35 dB relative to the in-band power spectral density, such that unwanted emission power, expressed as total radiated power, does not exceed –39 dBW in any 200 MHz of that band. As discussed in the interference analysis exhibit this meets the sensor-referenced protection criterion. Harmonic and other spurious emissions will be attenuated to meet the $43 + 10 \log P$ limit with margin, including not less than 45 dB of attenuation across 45–100 GHz, verified free of spurious passbands. The filter configuration implementing these commitments is set out in the Confidential Technical Annex. Applicant will verify the emission spectrum by measurement during Phase 1, across the range specified in 47 C.F.R. § 2.1057, prior to full-power operation.

Transmitter control. Consistent with § 5.107, the transmitter will be under the continuous control of qualified Applicant personnel at all times during operation, and can be de-energized immediately.

Stop buzzer. Applicant designates the following point of contact, available at all times during operation, with authority to cease all transmissions immediately: BRYAN CATTLE, (703) 783-3377, FCC@KMB.AC.

Radiofrequency exposure. Applicant will restrict access to the area within the calculated maximum permissible exposure boundary for the general population, and will manage personnel access within the occupational exposure boundary, in accordance with 47 C.F.R. § 1.1310. Personnel operating the station will be trained in the applicable exposure limits and in the perimeter procedures described above. The supporting evaluation, performed in accordance with the methods of OET Bulletin 65 and accounting for near-field conditions on boresight, is provided in the accompanying RF exposure exhibit.

Station identification. Applicant requests that the authorization specifically exempt the station from the identification requirements of 47 C.F.R. § 5.115(a). Section 5.115(a) requires that station identification be transmitted in clear voice or Morse code, with all digital encoding and digital modulation disabled during identification. The station's emission is a linear frequency-modulated continuous-wave chirp. The transmit chain contains no modulation path capable of generating voice or Morse identification.

10. Requested License Term

Applicant requests a license term of 24 months, the regular term for conventional experimental radio licenses under 47 C.F.R. § 5.71(a)(1). Applicant does not at this time seek the extended term available under that section. Should the sequential structure of the five-phase program, the dependence of Phase 5 on seasonal precipitation conditions at three climatically distinct sites, or the scheduling of cooperative target aircraft require additional time, Applicant will seek renewal under § 5.71(a)(2) on a showing of need supported by the results then obtained.

Applicant certifies that the foregoing is true and accurate to the best of its knowledge and belief, and acknowledges that operation under any authorization granted will conform to the program of experimentation described herein, as required by 47 C.F.R. § 5.111(b).