

Row 44 Narrative Statement

Row 44, Inc. ("Row 44") seeks an experimental authorization for a two year period to conduct laboratory testing and demonstration in support of its licensed aeronautical-mobile satellite service ("AMSS") network (FCC Call Sign E080100).¹ The planned testing will involve use of a GSM picocell across the Row 44 Ku-band network in a simulated aircraft cabin environment. Transmissions will employ 200 kHz bandwidth channels within the 1930-1990 MHz frequency range.

The objective of the program of experimentation is to understand the functionality of GSM devices, such as phones and Wi-Fi enabled laptops, in the on-board environment, and to assess both the quality and optimization required for implementation of a viable commercial service that permits operation of such devices. Results of these studies will assist Row 44 in potential future integration of GSM devices into the Row 44 AMSS network and service package. Specific services to be tested will be two-way voice, two-way SMS and GPRS (general packet radio services).

Evaluation of devices in the requested wireless mobile service bands will be intermittent and ongoing over an extended period, and will be coordinated as necessary with the relevant local wireless carriers operating in the vicinity of Row 44's Lombard, Illinois facility. Row 44 seeks an initial license term of twenty four months.

The equipment used in the operations requested herein may not be capable of providing compliant station identification in all circumstances. Accordingly, to the extent necessary, a waiver of Section 5.115 of the FCC's Rules is requested.

¹ Row 44 is currently the holder of experimental license WF2XBY, which permits operation of certain AMSS antennas on board aircraft.