

Background and Response to Question 7 on FCC Form 442

Background. Curtiss-Wright Controls Inc. (CW) filed a Part 15 waiver request with the FCC in June 2010 seeking authorization to operate its 3d-Radar ground penetrating radar (GPR) device for non-federal use. (ET Docket No.10-167.) In July 2011 (while this waiver request was pending), CW filed an STA request with the FCC (STA File Number 0407-EX-STA-2011) for authorization to conduct demonstrations of the 3d-Radar GPR device for prospective non-federal customers. The FCC granted an STA to CW (call sign WF9XAO) which expires on February 9, 2012.

On January 11, 2012, the FCC granted CW's waiver request which will allow CW to market the 3d-Radar device upon receiving FCC equipment authorization. (A copy of the waiver grant is being submitted with this application.) Although CW will not be able to obtain FCC equipment authorization for its device by February 9, 2012, CW wants to continue conducting demonstrations of its device for prospective customers beyond this date.

Section 5.61 of the FCC's Rules states: "Extensions of a special temporary authorization will be granted provided that an application for a regular experimental license has been filed at least 15 days prior to the expiration of the licensee's temporary authority. When such an application is timely filed, operations may continue in accordance with the other terms and conditions of the temporary authority pending disposition of the application, unless the applicant is notified otherwise by the Commission." Based on this Rule and input from FCC staff, we understand that CW may continue conducting demonstrations pursuant to its existing STA beyond February 9th once this application has been filed.

Narrative. In response to Question 7 on FCC Form 442, below is a narrative about the proposed use of the device (including a description of the equipment and theory of operation), the objectives to be accomplished, and how such use will contribute to the development, extension, expansion or utilization of the device and its application.

The 3d-Radar GPR device is an ultra-wideband emitter regulated under the Part 15 Rules which is used to survey sub-surface and below ground structures. Under an experimental authorization, activities will be of limited duration for a few hours each day on selected days and at selected locations in the U.S. as determined by prospective customers. Through demonstrations for (and discussions with) prospective customers, CW will be able to better assess customer needs which, in turn, may impact the development and implementation of certain functional aspects of the device.