

NARRATIVE STATEMENT

Pursuant to Sections 5.3 (e), (f), (h), Section 5.61 and Section 5.53 of the Federal Communications Commission (“FCC”) rules, 47 C.F.R. §§ 5.3 (e), (f), (h), 5.61, 5.53 (2017), Chrome Enterprises LLC respectfully requests a six-month experimental special temporary authority (“STA”) to operate on selected channels in the upper fifty MHz of the Citizens Broadband Radio Service (“CBRS”) band (3650-3700 MHz) for the purpose of proof of concept testing and evaluating the performance and reliability of CBRS equipment and associated software designed to support innovative communications capabilities and functionalities. The following provides additional details regarding this request.

A. Purpose of Operation and Need for STA:

Chrome seeks FCC experimental authority to evaluate CBRS equipment and associated software designed to test the transmission of wireless signal between temporary fixed location to mobile devices and vice versa inside the building for proof of concept. Chrome proposes to operate a limited number of low power, temporary fixed base transmitters and associated mobile units indoors at facilities in Sunnyvale, Cupertino and Tracy, CA. Chrome requests a six-month authorization to conduct the tests.

Chrome does not seek authority to conduct market studies or provide communications services under the requested experimental authority. The participants in the research are principals or employees of the company and will be advised that: (a) the operations are being conducted under an experimental authority issued to Chrome, (b) the company is responsible for the experimental activities, (c) all operations are being conducted on a non-interference basis, and (d) after the test is completed, Chrome will retrieve and recover all devices that do not comply with FCC regulations. Chrome understands that the FCC may specify these as well as other conditions on its authorization.

B. Dates and Locations of Proposed Operation:

Chrome proposes to conduct tests indoors at Sunnyvale, Cupertino and Tracy, CA. The dates and coordinates of the proposed testing are provided below. Tests will be conducted at temporary fixed locations within a radius of 2 km of the specified coordinates:

Dates	Coordinates (NAD83)
December 10, 2018 – June 10, 2019	37°24'18"N, 122°01'43"W
December 10, 2018 – June 10, 2019	37°19'19"N, 122°02'05"W
December 10, 2018 – June 10, 2019	37°44'27"N, 121°24'41"W

C. Technical Specifications:

1. Frequencies Desired

Chrome proposes to operate limited number of low power, indoor equipment in the upper fifty MHz of the CBRS band as shown in the table below:

Operating Bandp	Frequency (MHz)
Low	3650
High	3700

Chrome will coordinate and cooperate with licensees and other users to ensure against interference. Moreover, Chrome does not propose to operate on channels deployed by licensees in the public safety, aeronautical, or public coast radio services. Chrome does not plan to operate on all channels within the band. Company personnel will monitor the operations of other users before commencing transmissions to select appropriate channels so that it may avoid interference to licensed users. In the event that it receives a complaint of interference resulting from the proposed operation, Chrome will take immediate action to address the interference, including if necessary discontinuing its operations.

Although it is taking these precautions, Chrome does not expect harmful interference to occur, as the proposed operations will be limited in scope. The transmitters will only operate inside buildings.

2. Equipment To Be Used

Chrome seeks to evaluate the performance and functionality of the equipment at various transmit power levels. All power levels will comply with the limit set forth in the FCC's rules, including those relating to human exposure to radiation. The peak proposed transmitter output power ("TPO") and effective radiated power ("ERP") levels are provided in the tables below.

Radio Information

Equipment Type	Temporary Fixed Units	Mobile Units
Manufacturer	TBD	TBD
No. of Units Per Location	Maximum of 25 units at Sunnyvale and Cupertino Maximum of 100 units at Tracy	Maximum of 50 units at Sunnyvale and Cupertino Maximum of 200 units at Tracy

Temporary Fixed Units

Modulation	Emission Designator	Bandwidth (MHz)	Max TPO (W)	Max ERP (W)
LTE (OFDM)	10M0W7W	10	1	4
LTE (OFDM)	20M0W7W	20	2	8

The combination of the conducted power and the antenna gain will comply at all times with the 47 dBm per 10 MHz limit for Citizens Broadband Radio Service Devices ("CBSDs") as set forth in 47 C.F.R. §96.41.

Mobile Units

Modulation	Emission Designator	Bandwidth (MHz)	Max TPO (W)	Max ERP (W)
LTE (SC-FDMA)	10M0W7W	10	1	4
LTE (SC-FDMA)	20M0W7W	20	2	8

The combination of the conducted power and the antenna gain will comply at all times with the 23 dBm per 10 MHz limit for end user devices (“EUDs”) as set forth in 47 C.F.R. §96.41.

3. Antenna Information

Any antennas will be installed in accordance with Federal Aviation Administration (“FAA”) and FCC rules and regulations. The table below provides information about the antennas.

Type of Antennas	Directional panels & omnidirectional verticals
Gain	0-6 dBi
Beam Width at Half-Power Point	30-360
Orientation in Horizontal Plane	Various (0-360 azimuth)
Orientation in Vertical Plane	Various (+10 to -45)

D. Public Interest Statement:

Chrome submits that issuance of experimental special temporary authority as requested is in the public interest, convenience, and necessity. Such action will permit it to conduct proof of concept testing and evaluation of the performance and reliability of prototype equipment and associated software designed to support innovative communications capabilities and functionalities.

E. Contact Information:

<u>FCC Counsel:</u>	<u>Technical Contact/Stop Buzzer Contact:</u>
<p>For questions about this application, please contact:</p> <p>Kurt DeSoto Wiley Rein LLP 1776 K Street, N.W. Washington, DC 20006 Telephone:(202) 719-7235 Email: kdesoto@wileyrein.com</p>	<p>In the unlikely event interference concerns should arise during the period of authorization for this authorization, please contact:</p> <p>Pamela A. Jasinski Chrome Enterprises LLC 11555 Medlock Bridge Suite 100 Johns Creek, GA 30097 Telephone: (302) 691-6043 Email: Chrome_enterpriseLLC@yahoo.com</p>