

NATIONAL FOOTBALL LEAGUE
Request for Grant of Special Temporary Authority
File No. 1195 –EX-ST-2020
Narrative Explanation of Operation

The National Football League (NFL) is in the final stages of planning for the 2020-2021 football season in a safe manner relative to the Coronavirus. The football teams of the NFL must travel from their home stadiums to play away games. The teams and staff travel together and the NFL is doing everything possible to ensure that the teams, their staff and the NFL operations personnel maintain safe distances and that, should a case of coronavirus occur, that there is contact tracing in place so as to be able to limit the spread of the virus.

NFL has contracted with Kinexon for an advanced technological contact tracing solution which will help to ensure adherence to physical distancing guidelines among traveling staff. KINEXON SafeZone is an RF-based contact tracing system, the core element of which is a wearable sensor that actively warns the user as soon as the minimum physical distance to another person is compromised. The system works with no infrastructure and has contact tracing capability with associated software to allow reliable contact tracing, should that be necessary.

Each player and each staff member of each team will be issued wearable tags and they will be on at all times during practice sessions, games, and times of team travel.

These devices are certified by the Commission and operate pursuant to the Section 15.250 rules governing wideband devices. The occupied bandwidth is 489 megahertz and the devices operate in the 6.5 GHz range at exceptionally low power. The average EIRP is less than 74 nanowatts per 1 megahertz, and the peak EIRP is less than one milliwatt per 50 megahertz (the RMS average EIRP is below -41.3 dBm / 1 MHz and the peak level contained within a 50 MHz bandwidth is below 0 dBm EIRP).

The reason why an STA is necessary (and urgently so, given that the football season is imminent) is that the devices operate at 6.5 GHz. The NFL player tracking system during football games provided by a vendor also operates at 6.5 GHz. Testing of compatibility shows that there is potential interaction between the player tracking system and the co-channel contact tracing sensors. Player tracking during football games is a benefit for television viewers that viewers have come to expect and rely on. The proposed solution for this, and the instant STA request, is for the contact tracing system to operate temporarily, by STA, at a 4.5 GHz center frequency (i.e. 4.255-4.745 GHz) during this football season, so as to enable the NFL to deploy, on a nationwide basis, up to 2000 body-worn sensors. All other operating parameters will be as per the existing Part 15 certification.

The “stop buzzer” contact for this deployment will be Michael Katzenoff, whose mobile telephone number is (212)450-2368. Undersigned communications counsel is also available to serve as a stop buzzer contact.

At the end of the STA period, all 4.5 GHz devices will be collected and reconfigured to operate at 6.5 GHz per the certification or retired from operation by the vendor.

Further information is available from counsel for the applicant:

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