

NARRATIVE STATEMENT
EXPERIMENTAL AUTHORIZATION APPLICATION - MODIFICATION
10BAND LLC

10Band LLC (“10Band”) seeks to modify its experimental authorization (WI2XNX) to conduct market trials, limited in scope, to evaluate the utility to potential users of low latency financial data delivered via its HF technology. This Exhibit provides a description of the proposed modifications and how the market trial has a reasonable promise of contribution to the development, extension, expansion, or utilization of the radio art.

Proposed Modification of Experimental Scope

The proposed market trial seeks to determine whether the technologies being developed by 10Band for the HF frequency range are suitable for transmission of time-sensitive financial market data. In particular, 10Band proposes to transmit test subsets of that data to a limited number of trial participants as explained below. The data would be transmitted from points in the U.S. to points in Europe and Asia.

Pursuant to Commission grant of experimental authorizations, and working with academic researchers, 10Band has made significant progress toward developing new and improved technologies for use of the under-utilized HF band. While that work is on-going, 10Band now seeks to gauge the reaction of trial participants as a complement to its own assessments. That is, in order to evaluate demand for 10Band’s data delivery service, it must gather real-world assessments of its value for potential customers versus the numerous other sources of market data utilized by those customers in their trading businesses. Participants will include third parties not affiliated with 10Band, and will be limited in number to 50 or fewer.

As a condition to their involvement, participants will be asked to provide feedback on the potential value of 10Band’s service versus other sources of such information. Among other things, this entails user reactions to the quality and timeliness of the received transmissions. End user reactions will also enable 10Band to assess the effects of seasonal and time-of-day fluctuations in the HF medium, the effects of bandwidth limitations, and the effects of data compression and any resulting errors in the received data. Delivering time-sensitive financial market data across a low latency HF link presents unique challenges in terms of both technical factors such as bandwidth and reliability, as well as end-user challenges such as the use of a lossy data service. The market trial will help 10Band determine whether its technology needs further refinement to overcome such issues.

Proposed Modification of Technical Parameters

10Band also requests a modification of the existing authorization to add the station locations shown in the submitted Form 442. The additional stations are needed to provide service to trial participants in the regions referenced above, as well as evaluate the technical performance of a new antenna type.

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Grant of the requested modification would enable 10Band to continue to pursue significant advancements in the development of the radio art and therefore would serve the public interest generally and the intent of the Commission’s Part 5 framework specifically.