

**POLTE CORPORATION STATEMENT IN SUPPORT OF
EXPERIMENTAL STA APPLICATION**

Pursuant to Section 5.63(c)(1) of the Rules and Regulations of the Federal Communications Commission (“FCC” or “Commission”), Polte Corporation (“Polte”) hereby demonstrates support for its application for a Conventional Experimental radio STA.

I. Background

Polte provides cloud-based location technologies to track IoT and mobile devices using LTE/4G and 5G networks. Polte’s patented technology provides all types of location (TOA, AOA, RTT), for all devices (5G, CBRS, Cat-1, Cat-M, NB-IoT), on any 4G and 5G network. Polte’s location solution offers numerous advantages over other technologies, including with respect to the z-axis location. Because processing is cloud-based, Polte’s technology reduces the size, cost and power requirements for tracked devices, while providing both indoor and outdoor high accuracy positioning. This increases asset tracker battery life in IoT use cases ranging from logistics, transportation, manufacturing, to energy.

II. Description of Program

Polte seeks experimental authority to evaluate and demonstrate its location technology at an upcoming industry showcase open to commercial users and government agencies, including the Department of Defense, U.S. Navy, U.S. Air Force, U.S. Army, U.S. Marines, and U.S. Postal Service. Polte’s demonstration will consist of a radio transmitter located inside an industrial warehouse in York, PA. The transmitter will employ four indoor antennas and will transmit on 3,352.26 MHz (98.28 bandwidth). No outdoor operations will be conducted. The test will consist of transmission of a 5G carrier, which will be used to evaluate Polte’s location technology. Maximum power and other technical parameters are provided in the attached Form 442.

The actual demonstration will commence on or about December 15, however there may be intermittent operations the week prior during installation. Authority is requested until June 1, 2022.

Polte representatives will be onsite at all times to control operations during transmissions, which will be conducted on a secondary non-interference basis.

III. Objectives of Experimental Program/Contribution to the Radio Art

In accordance with Section 5.63(c)(1) of the FCC’s rules, Polte’s operation will contribute to the radio art by allowing evaluation of its innovative location solution in the 3.1-3.55 GHz band. The Commission is studying the use of this band for shared use of spectrum between federal incumbents and commercial wireless services for the promotion of 5G services. The Commission has noted the availability of the 3.1-3.55 GHz band for experimental

operations, such as those proposed by Polte.¹ In addition, the Commission has undertaken a multi-year effort to improve wireless service location accuracy capabilities.²

Polte's proposed operations promotes each of these commission objectives in that it will allow evaluation of range, performance, and capabilities of Polte's location technology. Accordingly, Polte respectfully requests that the Commission grant this request.

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¹ See Facilitating Shared Use in the 3100-3550 MHz Band, WT Docket No. 19-348, *Report and Order and Further Notice of Proposed Rulemaking*, 35 FCC Rcd 11078, para. 21 (2020).

² See, e.g., PS Docket No. 07-114.