

TRELLSWARE TECHNOLOGIES, INC.
FORM 442 NARRATIVE STATEMENT

TrellisWare Technologies (“TrellisWare”) is currently licensed to conduct experimental transmissions at several frequencies in the L & S bands for the purpose of conducting testing and experiments for product development of its TSM-enabled software defined radios (“SDRs”). These licenses (WJ2XJL for San Diego and WJ2XYH for Borrego Springs) cover handheld radio and manpack platforms operating with 50 kHz, 1.2 MHz, 4 MHz, 10 MHz, 20 MHz and 40 MHz instantaneous bandwidths.

TrellisWare’s SDRs serve a wide range of customers, including: (a) government & defense; (b) first responders; and (c) commercial customers. Some of these customers would like TrellisWare’s radios to interoperate with legacy radios for disaster relief and coalition operations. Therefore, TrellisWare would like to add licenses to conduct transmission at several frequencies in the L & S bands for the purpose of conducting testing and experiments for product development of its ULOS-enabled SDRs.

Product Description, Purpose of Operation and Need for Experimental License

ULOS is a waveform designed to run on SDRs. It provides backwards compatibility with many legacy handheld radios for voice and data communications. ULOS is not based on technologies such as Wi-Fi (802.11), DECT, WiMax (802.16) or LTE chips, and it is not dependent on internet-driven routing protocols.

TrellisWare proposes to test and develop its ULOS-enabled SDRs for sale (once approved by the FCC) to its government & defense, first responder, and commercial customers. Because mission-critical communications take place in highly mobile, dynamic environments, TrellisWare must test and develop the ULOS-enabled SDRs to ensure that they will provide mobility and robust communication in harsh RF environments. TrellisWare will also troubleshoot technical issues and train its applicable employees on all aspects of the ULOS-enabled SDRs to ensure the highest quality customer support.

Public Interest Statement

TrellisWare submits that issuance of the requested experimental license will serve the public interest, convenience and necessity. The ULOS-enabled SDRs will contribute to the expansion of services to: (a) government & defense; (b) first responders, and (c) commercial customers by providing backwards compatible communication solutions with legacy radios already owned and operated by these entities while providing them a radio that can be upgraded to include more advanced waveforms which can improve robustness and throughput.

Grant of the requested experimental license will enable TrellisWare to conduct necessary testing and product development that will ensure that the subject SDRs are properly designed so that

they will be operational at the highest level of efficiency when used by its government & defense, first responder, and commercial customers.

Restrictions on Operation

TrellisWare also understands that the proposed experimental operation must not cause harmful interference to authorized facilities or operations. TrellisWare does not anticipate any interference issues. In the unlikely event that any interference occurs, TrellisWare will immediately take steps to resolve the interference, including discontinuing operation, if necessary. TrellisWare proposes to label the subject SDRs with the following information:

FCC Statement

Permission to operate this device has been granted under experimental authority issued by the Federal Communications Commission, is strictly temporary and may be cancelled at any time.

Special Conditions:

- (1) In lieu of frequency tolerance, the occupied bandwidth of the emission shall not extend beyond the band limits set forth in the instant application.
- (2) Licensee should be aware that other stations may be licensed on these frequencies and if any interference occurs, the licensee of this authorization will be subject to immediate shut down.

Stop Buzzer Contact

"Stop Buzzer" contact is Jon Penner. Mr. Penner can be reached at (858) 753-1658 and shall be available during testing to cease operations in the event of any interference.