

To whom it may concern,

Regarding license denial – In 2020 Liteye Systems, Inc, now part of High Point Aerotechnologies (HPA), had entered into an agreement to provide training to Field Service Representatives (FSR) for maintenance of USAF owned Anti-Unmanned aerial vehicle Defense Systems (AUDS) used for Counter UAS operations. As per USAF agreements, we submitted for an STA for operation of Ku band radar to conduct training at Pinon Canyon, Colorado. Upon review of our STA application, File Number 0657-EX-ST-2020 Confirmation Number EL644486, the Army Spectrum Manager denied our application due to possible interference with Federal UAS operation at Pinon Canyon.

After receiving the denial, Liteye engaged the USAF spectrum group at Hanscom AFB to coordinate with Army Spectron Office in San Antonio, TX and Fort Carson, CO to deconflict the requested frequencies needed for operation of AUDS Ku radar (15.7 GHz-17.2 GHz)

Regarding Counter UAS operations – HPA is requesting a license for Ku band radar operation only. No Counter UAS operation such as jamming or other Electronic Warfare (EW) or Electronic Counter Measures (ECM) will be used as per the Communications Act of 1934, Section 333. Should Federal entities desire demonstration or use of EW and ECM, it shall be the responsibility of those entities to pursue an STA or other authorization through the entity's spectrum office and the NTIA.

Regarding radar operation – HPA requests STAs for operation of Ku band radar on an as-needed basis for specific non-Federal locations through FCC OET.

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