



L3HARRIS™

James Ziarno
Director of Technology
Commercial UAS Solutions,
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October 8, 2019

To Whom It May Concern,

L3Harris Technologies is an agile global aerospace and defense technology innovator, delivering end-to-end solutions that meet customers' mission-critical needs. We provide advanced defense and commercial technologies across air, land, sea, space and cyber domains. We bring speed, innovation and flawless execution together with our commitment to make the world more secure.

L3Harris is also a 30-year partner with the Federal Aviation Administration (FAA) providing air traffic management, communications, weather, and surveillance solutions for the most complex air traffic system in the world. We are currently building from our extensive national FAA Next Generation Air Transportation System (NextGen) network infrastructure capabilities to develop products and services enabling the integration of Unmanned Aircraft Systems (UAS) into the National Airspace System (NAS).

In support of these UAS programs, L3 Harris Technologies is requesting FCC Part 15 Certification for an Unmanned Aircraft System (UAS) ISM radio which will be used to validate our UAS Command & Control (C2) Radio System in North Dakota.

Pursuant to FCC Rules 47 CFR § 15.203 Antenna Requirement, the Applicant's installations should be considered "*professional*" and therefore not covered by § 15.203 (below).

§ 15.203 Antenna requirement.

An intentional radiator shall be designed to ensure that no antenna other than that furnished by the responsible party shall be used with the device. The use of a permanently attached antenna or of an antenna that uses a unique coupling to the intentional radiator shall be considered sufficient to comply with the provisions of this section. The manufacturer may design the unit so that a broken antenna can be replaced by the user, but the use of a standard antenna jack or electrical connector is prohibited. This requirement does not apply to carrier current devices or to devices operated under the provisions of §§ 15.211, 15.213, 15.217, 15.219, 15.221, or § 15.236. Further, this requirement does not apply to intentional radiators that must be professionally installed, such as perimeter protection systems and some field disturbance sensors, or to other intentional radiators which, in accordance with § 15.31(d), must be measured at the installation site. However, the installer shall be responsible for ensuring that the proper antenna is employed so that the limits in this part are not exceeded.

The referenced ISM radio is not available to the average consumer nor will it be marketed to the commercial public. The radio will only be installed by professional trained representatives of L3Harris, that understand the applicable FCC Part 15 Rules & Regulations, including use of the approved ISM Radio (2.4 GHz), cables, connectors and antennas.

Please do not hesitate to contact me for additional information or clarification as we look forward to receiving FCC Part 15 Certification approval.

Sincerely,

James Ziarno
Commercial UAS Solutions, Director of Technology
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