



To: FCC OET

From: Nextwave Wireless  
3611 Valley Centre Drive  
San Diego, CA 92130

Dear Sirs/Ma'ams:

This is a submission for Type Approval for a portable device that is to provide wireless internet access in the frequency band 2483.5 – 2495 MHz which was formerly dedicated to the Globalstar satellite phone service. Nextwave is a maker of WiMax semiconductor chipsets which are used for wireless internet access in the “WiMax” frequency bands, typically between 2.3 GHz to 2.7 GHz or 3.3 GHz to 3.8 GHz. Availability of the frequency spectrum in the 2.4835 GHz to 2.495 GHz due to Globalstar satellite failure has resulted in a combined effort between Nextwave Wireless, Open Range Communications, and Axonn Global Data Solutions. Open Range Communications plans to deploy the terrestrial network enabling wireless internet access in rural areas. Axonn manufactures a personal satellite tracker and rescue signal sending device using the Globalstar satellite network. Nextwave has integrated a WiMax chipset into an Axonn “SPOT” (satellite personal tracking) device, making the device a dual-use (a requirement for this spectrum) satellite personal tracker *and* WiMax wireless internet access modem. This device demonstrates that a consumer product is feasible, and following the approval of the waiver which has been applied for by Open Range Communications, Nextwave can create a more refined product.

WiMax devices fall under 47 CFR part 27, but this frequency falls under part 25, so the application is for a part 25 device. A better understanding of the frequency use is gained by reading this document, FCC order 08-98A1, found at [http://hraunfoss.fcc.gov/edocs\\_public/attachmatch/FCC-08-98A1.pdf](http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-08-98A1.pdf)

The SPOT device by Axonn has FCC ID L2V-PT1. The new dual-use device includes a WiMax transceiver in addition to the Globalstar transmitter of the Axonn SPOT device. The two transmitters will not operate simultaneously. For WiMax use, a supplied dual connector USB cable is required to be attached between this device and a personal computer. This cable is supplied with every unit sold, and the user cannot replace it with a standard off-the-shelf connector, because the WiMax unit will not operate without it. This special dual-USB cable is provided with every device classifying it as a mobile device instead of a portable device.

Sincerely,

Dan Laramie  
Nextwave Wireless Inc.  
858-480-0540