

Introduction:

By the instant application (“Application”), Saankhya Labs requests that the Commission grant Special Temporary Authority (STA) to operate the facilities specified in the instant Request for Special Temporary Authority for the period of April 12 to April 19, 2024.

The STA will be used for demonstration purposes at the National Association of Broadcasters Show within the Las Vegas Convention Center to educate the industry on the capabilities of the newly developed equipment discussed below.

The FCC granted an STA for the identical facilities in 2023 (See **Exhibit A**).

Purpose of the Operation:

Saankhya Labs requests authorization to test a prototype Direct to Mobile Broadcast system. This Direct To Mobile (D2M) Broadcast technology is a critical component of several solutions Saankhya Labs plans to introduce for Direct to Mobile Broadcasting services.

Direct To Mobile (D2M) Broadcast solution is a fifth-generation data transmission solution that will allow more devices to access voluminous data simultaneously, via a single broadcast. This technology will optimize the delivery of linear and OTT content from streaming services. The system will significantly reduce network congestion, allow for faster downloads, and provide a better user experience for consumers. The applications for Direct To Mobile (D2M) Broadcast solution include “Direct to Mobile” broadcast, Push and Timed OTT Delivery, Firmware-over-the-air (FOTA) and Software-over-the-air (SOTA) for connected cars among others.

The proposed experiment will be conducted in connection with potential deployments of the technology described above.

Operating frequency: 572 to 578 MHz (6 MHz channel), Center frequency: 575 MHz
Power: EIRP : <100 milli Watts (<20dBm)

Interference Mitigation:

Saankhya Labs is aware of its obligations under the Commission’s rules to avoid interference to existing licensees in non-experimental services. Saankhya Labs will take all necessary steps to ensure compliance with this obligation. In particular, the following factors will help mitigate any interference issues:

1. Operation will be limited in time and location.
2. Saankhya Labs will be operating on vacant co-channel spectrum which has been identified to eliminate interference to existing broadcast facilities.
3. Overall, Saankhya Labs expects that it will test the product no more than 7 days during the requested STA period.

4. There will be no outdoor testing. At the power level specified in the application, no interference outside of the convention center is expected.

Stop Buzzers:

The following will be onsite, and available by wireless telephone to serve as the “stop buzzer” if any issues arise during testing:

- Louis Libin, VP, Sinclair Broadcast Group, Inc., 526-374-6700;
- Prashant Maru, VP in Saankhya Labs, 91-8080467111;
- Krishna Kishore, Senior Manager in Saankhya Labs, 91-9741811022.

EXHIBIT A
(Letter Granting 2023 Experimental Authorization)



Federal Communications Commission
Washington, D.C. 20554

March 24, 2023

Saankhya Labs PVT LTD
c/o Pillsbury Winthrop Shaw Pittman LLP
1200 Seventeenth St., NW
Washington, DC 20036

In Re: Request for Authority to Operate an
Experimental Facility
0000212748
Fac Id: 777247

Mr. Petro,

This refers to the above-referenced application, filed by Saankhya Labs Private LTD (Saankhya), requesting authority to operate an experimental digital television facility on Channel 31 in Las Vegas, Nevada. Specifically, Saankhya's operation will be a demonstration of their Direct to Mobile Broadcast System, which will optimize the delivery of linear and OTT content from streaming services.

After a thorough review of the technical specifications, we are persuaded that no interference is likely to occur from the proposed operation. We therefore conclude that the public interest would be served by the grant of this request since the information obtained from the experiment may be valuable to the Commission's broadband initiative. However, we caution you that an experimental facility is secondary and may be summarily terminated if the operation causes interference to any other broadcast facility. Also, compliance with Section 1.1307(b) of the Commission's Rules (radio frequency radiation) is required.

Accordingly, the request for experimental authority to broadcast on Channel 31 in Las Vegas, Nevada, **IS GRANTED** subject to the following conditions:

1. The grant of this authorization is subject to the condition that, with ample time before commencing operation, you make a good faith effort to identify and notify health care facilities (*e.g.*, hospitals, nursing homes, see 47 CFR 15.242(a)(1)) within your service area that may potentially be affected by your operations.
2. Pursuant to Section 5.207, a report will be filed with each application for renewal of this authorization, containing the information required by that Section and any other relevant information deemed appropriate by the licensees. In addition, should any unusual problems or conditions arise during the authorization period, the licensees shall inform the Commission of them at the time they occur.
3. This authorization allows operation from **April 14 to April 21, 2023**.

Sincerely,

/s/

Kevin R. Harding
Deputy Chief, Video Division
Media Bureau

cc: Lee Petro