

October 2, 2019

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Liberty Defense Holdings, LTD. request for waiver of Sections 15.31(c), 15.503(d), 15.511(b), 15.511(f) and 15.521(d) of the Commission's rules ("Waiver"); ET Docket No. 19-217*

Dear Ms. Dortch:

In its September 11, 2019 *ex parte* notice filed in the above-referenced docket, Liberty Defense Holdings, LTD ("Liberty") indicated that the Federal Communications Commission ("Commission") Office of Engineering and Technology ("OET") staff requested more information concerning how the term "private security personnel" should be defined for purposes of proposed condition 1(c) in Liberty's pending Request for Waiver.¹ The condition proposes to relax the eligible user requirement set forth in Section 15.511(b) of the Commission's rules² to enable the HEXWAVE system to be marketed to, and operated by, private security personnel. The OET staff asked Liberty to propose a definition for the term "private security personnel."

For purposes of Liberty's proposed eligibility condition, Liberty proposes to define the term "private security personnel" to mean "individuals and organizations (other than public law enforcement personnel and agencies) that primarily are engaged in the detection of crime and threats to people and property at sites at which people aggregate, including providers of (i) proprietary or contractual guard and screening services, (ii) electronic security systems integration and management services, and (iii) security consulting services."

¹ Liberty Defense Holdings, LTD dba Liberty Defense Technologies, Request for Waiver, ET Docket No. 19-217 at Exhibit A (filed May 8, 2019); *see also Office of Engineering and Technology Extends Comment Cycle Deadlines on Liberty Defense Holdings, Ltd. Request for Waiver of Certain Part 15 Ultra-Wideband (UWB) Rules*, Public Notice, ET Docket No. 19-217, DA 19-898 (OET rel. Sept. 11, 2019); *Office of Engineering and Technology Seeks Comment on Liberty Defense Holdings, Ltd. Request for Waiver of Certain Part 15 Ultra-Wideband (UWB) Rules*, Public Notice, ET Docket No. 19-217, DA 19-706 (OET rel. July 25, 2019).

² 47 C.F.R. § 15.511(b).

Pursuant to Section 1.206 of the Commission's rules,³ this *ex parte* notice is being filed electronically via the Electronic Comment Filing System in the above-referenced proceeding. Please do not hesitate to direct any questions about the foregoing to the undersigned.

Respectfully submitted,

LIBERTY DEFENSE HOLDINGS, LTD. DBA
LIBERTY DEFENSE TECHNOLOGIES

/s/ Aman Bhardwaj

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³ 47 C.F.R. § 1.206.