

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
Secondary Use of the 24.25 – 24.65 GHz Band) RM-11819
For Radiolocation Services)

COMMENTS IN SUPPORT OF PETITION FOR RULEMAKING

Black Sage Technologies has reviewed Echodyne's petition for rulemaking and agrees that the FCC should authorize use of Echodyne's radar technology for radiolocation in the 24.45-24.65 GHz band.

Black Sage Technologies is a leader in the development and deployment of sophisticated security systems to counteract the fastest growing threats for civilians and military personnel. We develop autonomous and interoperable hardware and software platforms that provide persistent protection across varying environments and mission sets.

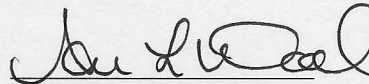
We believe that Echodyne's radars hold great promise to significantly improve our ability to detect unmanned aircraft and other moving objects more efficiently and more economically than other existing solutions. For example, we are using Echodyne's radar to secure sensitive government sites as well as large events where the public gathers and is vulnerable to drone-based attacks.

Black Sage Technologies agrees with Echodyne that drone detection "is a direct public safety application." Improving drone detection ability will enhance public safety by giving security professionals more time to assess a situation and initiate the most appropriate response. Effective

detection and identification of drones is essential before true commercialized use of unmanned aircraft can achieve its tremendous promise. Echodyne's radars are a significant piece of the puzzle for protecting the national air space.

While there are other radar and drone detection solutions available, the Echodyne technology addresses a significant market segment where there are few competitive solutions. It is our understanding that the spectrum that Echodyne seeks to occupy is very lightly used and has capacity to support drone detection radar technology. In our view, this is an excellent use of the spectrum that would satisfy a significant deficiency in the market. We therefore recommend that the FCC move quickly to authorize the use of this technology in a manner consistent with Echodyne's petition.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Ann Wood", written over a horizontal line.

Ann Wood
Chief Operations Officer
Black Sage

November 12, 2018