

From: Gil Estrella

To: John Kennedy

Date: November 10, 2003

Subject:

FCC File #: 0388-EX-ST-2003

Message:

Reference No.: 2768

Mr. Kennedy,

I'm providing the following responses to your email comments regarding our STA application, #0388-EX-ST-2003.

The frequency tolerances for the transmitters using the 162-174 MHz band do, in fact, meet the specified tolerance of 5ppm. All of the tolerances specified in the initial application were provided in units of "ppm". It was not clear to me, in the on-line application nor the associated search instructions, in what units this information should be entered. Until you go back and view the initial filing form it isn't obvious that it should be entered in percentage (%). I should have taken a closer look in the ELS User's Manual which also specifies percentage. In any case, all the transmitters being used are Commercial-Off-The-Shelf (COTS) equipment with no modifications. Their frequency tolerances are either 2.5 (0.00025%) or 2.0 (0.0002%) ppm.

All of the existing COTS transmitting equipment which will be used for this STA are capable of operating within the specified 12.5 kHz necessary bandwidth. I made the mistake of specifying all the emissions designators provided in the actual Grants of Authorization or the manufacturer's spec sheets for this equipment. Some of this equipment is designed such that it can be adapted to operate with other bandwidths but this is not the case for the National Distress and Response System (NDRS) that General Dynamics Decision Systems is enhancing for the United States Coast Guard (USCG).

I will add an attachment of the Initial Operational Capability (IOC) Plan for Atlantic City which illustrates that, for each of the VHF transmitters operating in the 162-174 MHz range and UHF transmitters in the 406.1-420 MHz, the bandwidths are all less than 12.5 kHz. The only exception to this is the Atlantic Common LE OPS transmission at 164.5500 MHz which has a necessary bandwidth of 16 kHz (Wideband Analog). This operation, however, is left as wideband for now to interoperate with legacy CG equipment but the radios are capable of narrowband transmissions. We expect the CG to go to all narrowband in this band as the legacy equipment is phased out prior to January 1, 2005.

I hope these responses adequately address your concerns. Please let me know if you have any other comments or questions.

Thank you very much.

Regards,
Gil Estrella
GENERAL DYNAMICS
Decision Systems