

Carl Huie

" 87PL05 " " OET Auling "

From: Carl Huie
Sent: Wednesday, April 13, 2005 2:09 PM
To: 'Mitchell Lazarus'
Cc: Raymond Quianzon
Subject: RE: Ubisense Dog-Mounted UWB Device

Noted and will enter into record. Application is granted.

*** Non-Public: For Internal Use Only ***

-----Original Message-----

From: Mitchell Lazarus [mailto:lazarus@fhhlaw.com]
Sent: Wednesday, April 13, 2005 2:00 PM
To: Carl Huie
Cc: Raymond Quianzon
Subject: FW: Ubisense Dog-Mounted UWB Device

Carl -- Below is the email from Julius Knapp allowing the Ubisense dog-mounted ultra-wideband device to be authorized under the rules for handheld ultra-wideband.

Please call if you need any further information.

Mitchell Lazarus
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-----Original Message-----

From: Julius Knapp [mailto:Julius.Knapp@fcc.gov]
Sent: Friday, April 08, 2005 11:35 AM
To: Mitchell Lazarus
Cc: Richard Green; Alan Scrimgeour; Karen Rackley; John Reed; Rashmi Doshi; Steve Jones
Subject: RE: Ubisense Dog-Mounted UWB Device

This refers to your request to permit certification of an UWB device for use on a dog collar under the provisions for hand held devices. The UWB rules define a hand held device as a portable device, such as a lap top computer or a PDA, that is primarily hand held while being operated and that does not employ a fixed infrastructure. 47 C.F.R. Sec. 15.503(m)

You argue that, while this device is not primarily hand-held while being operated, it meets the spirit of the rules. The device is hand-held in size. It will meet the emissions limit for hand-held devices and will not employ an outdoor infrastructure. You also assert that it poses no increased risk of interference relative to a device that is normally operated while held in the hand.

The rules UWB rules for communication devices operating in the 3.1 - 10.6 GHz band contemplated development of a variety of products, some of which are hand-held in size, but strictly speaking may not always be operated while held in the hand. ID and location tracking tags are one such example. We agree that the device you describe, which is hand-held in size, but is intended to be used on dogs for location tracking, meets the intent of the rules. Accordingly, the device may be certificated and operate under the rules as a hand-held UWB device.

Please let me know if you have any additional questions.

Sincerely,

Julius P. Knapp

Deputy Chief

Office of Engineering and Technology