



October 1, 1999

Mr. Frank Coperich, Engineer  
FCC Application Processing Branch  
FEDERAL COMMUNICATIONS COMMISSION  
7435 Oakland Mills Road  
Columbia, Maryland 21046

Subject: REPLY TO CORRESPONDENCE REFERENCE NUMBER 9816

FCC ID: AMWUH052 – 731 Confirmation Reference Number – EA94653

Dear Mr. Coperich:

Pursuant to your email request for additional information and confirmation, the following is our reply:

1.) Data for Section 22.915(b)(1).

This information is being uploaded separately as an attachment (Ref 9816 – 1) in the Adobe (.pdf) format.

2.) Data for Section 22.917(f).

The test to determine compliance to this requirement was duly taken; however, documentation to this was omitted by mistake from the original test report. According to Mr. Russell Grant, Wireless Group Manager, KTL Ottawa, "The spectrum was searched from 869 to 894 MHz for spurious emissions. No emissions were detected. Out threshold of sensitivity is -100 dBm. We forgot to put this in our report".

3.) Discrepancies between buttons shown in operating manual and the photographs.

We apologize that the original photographs did not show the button used to access the "911" emergency network. New photos showing this feature are being uploaded as exhibits (Ref9816-2 and Ref9816-3) in the JPEG format.

4.) Measured output power.

We were able to determine that the power measured at the antenna terminal was in fact 25.4 dBm which equates to 347 mW. The ERP measured on the range was calculated to be 320 mW. This is a reasonable disparity in our opinion; however, we agree that this should not have been listed on the FCC 731 form as 0.32 Watts. **Therefore, we are requesting that the "Rated RF power output in watts" in Item 12 (FCC Form 731) be changed from 0.32 watts to 0.347 watts in accordance to FCC Part 2.1046(a).**

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5.) Confirm mechanism for accessing the "911" emergency network.

As mentioned previously, we believe that our new photos will confirm this point. Also, this letter will confirm again that the number "911" is the only number capable of being dialed from this device. There are no provisions that make dialing other numbers possible.

6.) Confirmation of "low capacity" batteries.

We are uploading a new photograph (Ref 9816-4) showing the battery compartment and the AAA batteries used for powering this device. According to our engineering staff, the device should be capable of normal operation for at least 30 minutes provided fresh batteries are being used at the beginning of the operational state. They further provide that the maximum operation for continuous operation should not exceed 60 minutes when the device is operating at the maximum power level.

7.) Confirm that the unit is unable to access third-parties.

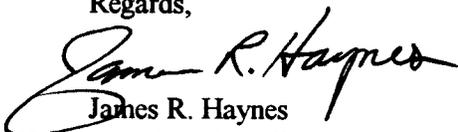
As stated above, it is our declaration that the subject device is only capable of dialing into the "911" emergency network. It is our further understanding that calls dialed into this network cannot be rerouted to other operators for "non-emergency" calls; however, this is beyond our control. As stated in our application documents, the number "911" is the only telephone number capable of being dialed by this unit.

Proposed Grant Conditions:

We fully agree to and accept the Proposed Grant Conditions shown in your email. Further, we suggest that the "XX" be replaced with "60" to reflect the maximum duration of continuous operation under normal use.

Thank you for your consideration in this matter. We trust that the above information and the attachments referenced will satisfy your concerns about this application and that the status will be changed to "Granted" as soon as possible.

Regards,



James R. Haynes

Vice President, Engineering and Regulatory Affairs