

Correspondence Summary

Q & A

November 16, 2004

SUBJECT: LUCENT TECHNOLOGIES INC.(HOLMDEL) - FCC ID: AS5ONEBTS-08

1. **TCB Question:** Radiated spurious emissions – part 2.1053/ SUBEXHIBIT 11.6: The FCC requires (since 1999) that the measurements for licensed devices be performed using the method of measurement as prescribed in ANSI/TIA/EIA-102.CAAA or ANSI/TIA/EIA-603 (not ANSI C63.4 which is only for part 15 devices). The calculation method using the free space equation to derive the power into a ½ wave dipole from a field strength measurement is no longer accepted by the FCC. Please revise the test data and method of measurement accordingly.

Applicant's Answer:

Radiated Spurious emissions test method submitted in AS5ONEBTS-08 have been used and submitted by Lucent and other manufactures for Part 22 and 24 applications many times since 1999 (see AS5CMP-46; AS5ONEBTS-06, IHET5DJ1, ...).

CFR 47 Sect. 2.947 Measurement Procedure (3) states "Any measurement procedure acceptable to the commission may be used to prepare data demonstrating compliance with the requirements of this chapter."

CFR 47 Sect. 1053 (a) states "...Information submitted shall include the relative radiated power of each spurious emission with reference to the rated power output of the transmitter, assuming all emission are radiated from halfwave dipole antennas."

From FCC Interpretations Database Site, questions regarding 2.1053
INQUIRY: To date we have perform and submitted Harmonic emission compliance using a converted -13 dBm to a field strength limit @ 3 meters (82.2 dBuV/m for EIRP or 84.2 dBuV/m for ERP). Again, is this still the acceptable method or is the substitution now the only preferred test method?

RESPONSE:

FOR CONSISTENCY, WE WANT EVERYONE TO USE THE SUBSTITUTION METHOD. HOWEVER, WHEN THE INITIAL MEASURED FIELD STRENGTH LEVELS OF THE SPURIOUS EMISSIONS ARE MORE THAN 20 DB BELOW THE ABOVE CITED LEVELS, THEN CONTINUATION WITH THE SUBSTITUTION METHOD IS NOT NECESSARY.

The information provided in AS5ONEBTS-08 Subexhibit 11.6 meets the above requirements (emissions more than 20 dB below cited levels).

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