

**American Telecommunications Certification Body Inc.**  
6731 Whittier Ave, McLean, VA 22101

February 8, 2001

Dear Mr. Heller,

I have given your application a brief examination and find the following deficiencies:

This is a Licensed service and not an Unlicensed band. The documentation and Exhibit requirements are somewhat different than that found in Part 15. Please refer to 2.1033 (c)(1) to (14) for the proper documentation to be supplied with this application.

- 1.) There is no emission designator description supplied with this Application. See 2.202 for examples and instructions.
- 2.) Tune up procedures were not supplied.
- 3.) The block diagram supplied is of little value because no frequency paths are noted. As a guide use the description in 2.1033(a)(5).
- 4.) No tune up procedure is supplied.
- 5.) The Technical Description file does not meet the requirements of 2.1033(c)(10).
- 6.) A digital modulation description per 2.1033(c)(13) is required.
- 7.) Please attest to how the label will be permanently attached per 2.925(d).
- 8.) FYI: For licensed services a photograph of the test setup is not required.

Within the test report, the applicable standards claimed include ANSI C63.4. This is in error. The correct standard to be used as a guide for this AM transmitter system is TIA/EIA 603.

- 9.) Emission Bandwidth (Occupied Bandwidth) is performed incorrectly. Using the standard rule of thumb, the RBW should be set as close to, but not less than 1% of the 99% power bandwidth. Please correct.
- 10.) Unwanted emissions are not to be performed using a quasi-peak adaptor. These are to be performed in peak mode using the dipole substitution method as described in TIA/EIA 603. Please correct. FYI: Use of the dipole substitution method allows the use of sites not normally suitable for C63.4 work.
- 11.) In addition to conducted power output, please provide radiated power output in ERP as well.
- 12.) Please provide demodulated oscilloscope presentations of the data train.
- 13.) Frequency multipliers are notoriously "dirty". Please be sure emissions at multiples of 1/3 the carrier frequency are within specification. The limit in 95.635 is  $56 + 10 \log(P)$  [-26dBm ERP].

If you have any questions, please do not hesitate to call.



William H. Graff  
Examining Engineer  
Vice President of Engineering

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal pursuant to Section 2.917(c). Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not reply to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must attach your answers to email correspondence. Reply to the examiner at the email address shown below. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.