

Responses:

From: M. Flom Associates, Inc. [general@mflom.com]
Sent: Thursday, September 25, 2003 5:04 PM
To: Gretchen
Subject: Re: RF NEULINK - FCC ID: B95-NL6000-VHF Job #1298UC3

Attached please find the signed project letter.

The modulation available in this modem for running random data can only be obtained in the diagnostic mode. For the narrow band it is 12 kps (for 9.6 kps requirement) and 22.05 kps (for 19.2 kps). There is no PAM signal feeding the transmitter to deliver a 4-FSK output signal.

- 1) Hence under Rule 2.201, emission designator F1D applies.
- 1) Occupied Bandwidth plots on pages 22, 23, 24, 42, 43 and 44 for 12.5 kHz spacing (12 kps); plots on pages 25, 30, 31, 45, 50 and 51 are for 25 kHz spacing (22.05 kps).
- 2) Attached please find the Amended Test Report which includes the Transient Frequency Response test and results.
- 3) R.F. Exposure Safety Instructions: The device comes equipped with time-out timer to avoid damage. The 50% duty cycle statement is to caution the user. See the Instructions to Users and Installers at the end of the MPE Report.
- 4) User Manual: The statement you refer to us a repeat of the other warnings in the manual to again caution the user, which applies to stated maintenance of 20 cm separation distance.
- 5) User Manual, R.F. Exposure: The test for R.F. Exposure was conducted at 20 cm as noted on page 7 in the MPE Report. 'General Population' requirements would imply that the transmitter met the SAR limits. Isn't that so?
- 6) Please see Rule Part 74.402(a), 74.402(a)(4) and 74.402 (authorized frequencies (b)(2). As stated in 74.402(a), 'may be assigned for use by remote broadcast pickup stations'.

We trust the above meets the requirements.

Regards,
Mort Flom, P. Eng., President
mf/cva

M. Flom Associates, Inc.

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19 September 2003

MR. MORTON FLOM
M. FLOM ASSOCIATES, INC
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GENERAL@MFLOM.COM

SUBJECT: RF NEULINK - FCC ID: B95-NL6000-VHF

REFERENCE: JOB 1298UC3

Questions:

1. Necessary Bandwidth Calculation: Please explain how this number is derived from the Pulse Amplitude Modulated (PAM) signal feeding the transmitter that delivers a 4-FSK output signal. The emission designator is marked as F1D.
1. Occupied Bandwidth Plots: Is the plot marked "random data" running at maximum data rate? Part 90.203(j) states: "...the equipment must be capable of supporting a minimum data rate of 4800 bits per second per 6.25 kHz of channel bandwidth." Please verify and state the EUT complies with this requirement for the 12.5 and 25 KHz bandwidths.
2. Transient Frequency Response: Part 90.214 calls for Transient Frequency Response Plots. Please submit. (none were found)
3. User Manual: RF Exposure Safety Instructions: For what reason is the 50% duty cycle statement listed?
4. User Manual: RF Exposure Safety Instructions: The statement "RF Exposure compliance must be addressed at the time of installation." Does this statement apply when it is stated to maintain a 20cm separation distance from the antenna?
5. User Manual: RF Exposure Safety Instructions: In the section called "Warning" it states: "...the requirements of Occupational/Controlled Exposure Environment, etc...." This EUT meets the "General Population" requirements, as it should. Should this statement be changed to "General Population," etc?

6. FCC Form 731: Item 13: You are asking for 22, 74, and 90 (90.210) Certification. In your Test Report, Page 5 of 58, you checked off: Part 74 Subpart H – Low Power Auxiliary Stations. The “Frequency Assignment” section in Part 74.802 does not list 148 MHz to 174 MHz, the operational frequencies of this radio. Is your request for 74H in error? Please show compliance with the Part 74 Rules you wish to Certify this radio.
7. Part 22: Similar question as Number 6. Under what Part 22 rules do you wish to Certify this radio? We need this to know if all items are covered in your Test Report. The FCC has stated to us: “We strongly (yes, they said strongly) want to see compliance for multiple part requests.” Therefore, please specify all the rule parts for compliance. Thank you.

Sincerely,

Gretchen Torres

