ELECTRONIC TECHNOLOGY SYSTEMS DR.GENZ GMBH

Federal Communications Commission
Authorization and Evaluation Division
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Attention: Mr. Joe Dichoso

IHR ZEICHEN / YOUR REF.	IHR SCHREIBEN / YOUR INFORM.	UNSER ZEICHEN / OUR REF.	DATUM / DATE
			10-Jul-02

Re: FCC ID BCE-GN9050
Applicant: GN Netcom Inc
Correspondence Reference Number: 23120
731 Confirmation Number: EA425209

Dear Mr. Dichoso,

Submitted herewith, on behalf of our customer, is an amendment to the subject application, provided in response to your request for technical information:

Q1. Please provide in more detail an explanation on the security code implementation and how it complies with 15.214.

Answer:

In addition to the reply to Correspondence Reference Number: 22894 the applicant declares: There is a fixed code that is continuously varied among an infinite number of discrete digital codes by sequentially increasing of one digit in time as each telephone is manufactured. This is in compliance with 15.214 (d)(1) and 15.214 (d)(2)(ii).

Q2. With regard to compliance with the radiated field strength level limits in the Restricted band of 2483.5-2500 MHz, there is a peak limit of 74 dBuV/m and an average limit of 54 dBuV/m. Your demonstration was for measurements with a 50 kHz RBW and peak level only. Peak and average levels must be submitted. Peak is measured with 1 MHz RBW and 1 MHz VBw. For pulsed emissions, the average level is determined by subtracting the duty factor of 10 log(total worst case on time within 100 mS / (100 mS)) from the peak level. Please provide new measurements and calculations. Indicate how the duty factor was calculated.

Answer:
Please find attached new measurement plots and calculations in order to fulfil your request.

Q3. Please provide a technical description without the "Sales gimmicks". Provide a corrected technical description on how the device operates. What is the number of channels? How is the sequence derived and provide samples of the true sequences.

Answer:

Please find attached a new edition of technical description.

Additionally the applicant provides following explanation in order to declare that there is not a special operating mode:

"In section 3.3.3 There is an example, which describes actually a situation where both frequency exclusion and dual-slot diversity is activated. In case frequency exclusion is used, you cannot use all 79 carriers, as we exclude carriers of two reasons. One reason is to avoid disturbance from other systems hereby making quality of service better in our own system. The second reason is to avoid disturbing other systems, which is also an important issue in the FCC-part 15, hereby incrementing quality of service in the other systems. The frequency exclusion algorithm is implemented in a way that substitutes the excluded carrier with the next frequency in the table - still maintaining the sequence except for this carrier only. See the example in documentation section 3.3. The decision to change between frequency exclusion and no frequency exclusion is based on CRC results from the connection established, and RSSI measurements performed in idle slots. If the RSSI measurement on one specific carrier becomes significantly higher that the remaining slots, the carrier is excluded, hereby decreasing the interference that we introduce to the other system, and increasing the quality of our own connection. The frequency exclusion algorithm is not a special operation mode, but is an integrated part of the frequency hopping algorithm. Actually we requested to FCC to be able to exclude more than 4 carriers in the frequency exclusion algorithm during heavy interference conditions, but was denied due the requirement that at least 75 carriers should be used."

We hope this information is sufficient to issue the grant. If you have further questions please do not hesitate to contact us.

Sincerely,

Jürgen Baschin

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