

## **Exhibit O: Previous Correspondence with FCC**

**FCC ID: CGGAA2**

# Fish & Richardson p.c.

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January 24, 2000

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Mr. Ken Nichols  
Chief  
FCC Laboratories  
7435 Oakland Mills Road  
Columbia, MD 21046

Our Ref.: 09529-002001

Dear Ken:

This is a follow up to our meeting at the FCC Labs on January 11, 2000, concerning Sentrol, a manufacturer of unlicensed range-controlled radar (RCR) devices. The purpose of the meeting was to discuss several regulatory issues associated with Sentrol's technology and to explain the Commission's views on how future certifications of Sentrol products will be handled.

You informed us that the Commission will be developing new policies on unlicensed wide-band emitters in connection with an upcoming Rulemaking proceeding, and that these policies may be applicable to Sentrol's technology. In the interim, however, you explained that there would be no change in how the Commission treats very short pulse width transmitters which, like Sentrol's, use tuned circuits and homodyne receiver technology. These devices will continue to be eligible for certification under Rule 15.249 provided the fundamental emission, with pulse desensitivity factors applied, complies with the Part 15 limits and provided any emissions in the restricted bands are considered spurious and meet the limits in Rule 15.209.

It was also made clear to Sentrol that until the FCC develops its new policies on wide-band, pulse emitters, Sentrol will not be constrained in the pulse width design it elects to use for its RCR products. Sentrol explained that its RCR technology is dependent on signal rise time, rather than pulse width, to perform its intended function. Sentrol understands, however, that should the FCC develop a policy that impacts the certification of its RCR devices, it will be given sufficient time to migrate to a new "approvable" architecture in order to recover the costs associated with its current RCR design.

I trust this letter accurately sets forth our discussion on these matters. Please contact me at your convenience if you believe I have left anything out or may have misunderstood anything discussed during our meeting.

Very truly yours,

Terry G. Mahn

cc: Kevin McDonald, Sentrol

Enclosure  
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