

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

SEP 1 1994

IN REPLY REFER TO:

31030/EQU/4-2-4  
1300B4

Mr. Valdis V. Liepa  
University of Michigan  
Radiation Laboratory  
NASA/Center for Space Terahertz Technology  
3228 EECS Building  
Ann Arbor, MI 48109-2122

Dear Mr. Liepa:

This is in reply to your facsimile transmission of August 2, 1994, regarding the labelling of a low power communication device that will be marketed within the U.S. and Canada. You request approval to combine the labels for both countries, permitting a single label to be employed. As indicated, this combined label would read as follows:

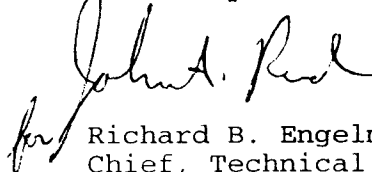
"This device complies with Part 15 of the FCC Rules and with RSS-210 of the Industry Canada. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation."

According to Section 15.19(a) of our rules, a low power communications device operating under Part 15 must be labelled with the specific statement contained in paragraph (a)(3). The only difference between the statement required under our rules and your proposed statement is the addition in the first sentence of the phrase "... and with RSS-210 of the Industry Canada."

I note that Kwai Lum of Industry Canada, in a facsimile to you on August 3, 1994, has already given permission to use this combined label. I also agree that the use of this combined label, as shown above, is acceptable under our regulations. This label conveys the desired information and is essentially identical to our requirement. As expressed by Mr. Lum, text denoting compliance with the standards for both countries was not stated in our rules as "it would be too presumptuous [to assume] that all products are for both markets."

I trust that the above responds to your inquiry. Additional questions should be directed to John Reed, 1300B4, at the address on the letterhead or at (202) 653-7313.

Sincerely,



for Richard B. Engelman  
Chief, Technical Standards Branch  
Office of Engineering and Technology

Government of Canada  
Industry Canada

Gouvernement du Canada  
Industrie Canada

FACSIMILE SHEET

FORMULE D'ENVOI PAR TELECOPIEUR

TO/A: Name/Nom.....: Mr Valdis V. Liepa  
Office/Bureau.: Radiation Lab, University of Michigan, USA  
Tel. No./No. de tél.: Fax: 313-747-2106

FROM/DE: Name/Nom.....: Kwai Lum  
Manager, Radio Equipment Standards,  
300 Slater Street, 13th Floor,  
Ottawa, Canada, K1A 0C8  
Phone: 613-990-4699; Fax: 613-952-5108

Total pages : Date & time sent: August 3, 94.  
Pages totales: 1 Date & heure envoyé:

Our Ref : DGEP-5630-1 (RSS-210 Labelling)

This is to respond to your fax of August 1, 94 requesting that we permit a combined statement for FCC and Industry Canada on the equipment labels.

We wish to assure you that your suggested combined label that you submitted in your fax is acceptable to Canada since our standard (section 5.8 of RSS-210) allows (to quote) ".....equivalent statement.....".

We have made our labelling statement as close as we can to Part 15.19(3); the differences are : we left out the word "harmful" because of difficulties in defining what is harmful. We added the phrase "of the device" to remove any possible misunderstanding.

To re-capitulate, although your proposed statement uses FCC text except for the mention of "RSS-210 of Industry Canada", we consider it to be equivalent. Our preferred text is per RSS-210; the next best is to add the word "harmful" to meet FCC requirements.

Since FCC and Industry Canada are from different countries, we do not consider it necessary to state in our separate standards a combined text. In any case it would be too presumptuous that all products are for both markets.

Our equipment certification staff will be informed of the above. We will also copy this to Mr Reed of the FCC since you said that you sent a similar fax to him.

Regards,



Kwai Lum

cc Mr John Reed (FCC OET fax 202-653-8773).  
cc R. Corey (Equipment Certification).



THE UNIVERSITY OF MICHIGAN  
COLLEGE OF ENGINEERING  
3228 EECS BUILDING  
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RADIATION LABORATORY  
DEPARTMENT OF ELECTRICAL ENGINEERING  
AND COMPUTER SCIENCE  
FAWWAZ T. ULABY, DIRECTOR

March 15, 2000

Re: Certification of Rolls-Royce/Clifford TX  
Model: CZ57RRTRRX  
FCC ID: CZ57RRTRRX  
CANADA: to be provided

STATEMENT OF MODIFICATIONS

There were no modifications made to this DUT by this laboratory. (Also see Section 3.1 of the Test Report).

Valdis V. Liepa  
Research Scientist

Re: Certification of Rolls-Royce/Clifford TX  
Model: CZ57RRTRRX  
FCC ID: CZ57RRTRRX  
CANADA: to be provided

POWER OF ATTORNEY

A letter granting Valdis V. Liepa the Power of Attorney is on file and can be provided when so requested.

Re: Certification of Rolls-Royce/Clifford TX  
Model: CZ57RRTRRX  
FCC ID: CZ57RRTRRX  
CANADA: to be provided

**PRODUCT INFORMATION**

The product for which the certification is pursued has been designed by:

**Clifford Electronics, Inc.**  
20750 Lassen Street  
Chatsworth, CA 91311

Contact:  
Jim Andreas  
Vice Prwesident - Operations  
Tel: (818) 709-7551 Fax: (818) 407-1742

The product will be manufactured by:

**Clifford Electronics, Inc.**  
20750 Lassen Street  
Chatsworth, CA 91311

Contact:  
Jim Andreas  
Vice President - Operations  
Tel: (818) 709-7551 Fax: (818) 407-1742

The product will be marketed and serviced by:

Rolls-Royce Automobile Dealers  
in US and Canada