Frequency	Field Strength level in uV/m	
	30 meter distance	300 meter distance
127 kHz	185	18.5
380 kHz	5.85 ≅ 6	≅ 0.6

This table was generated to respond to the questions raised by the FCC regarding table 9 of the test report. The levels of signals as represented on the graph were made at a distance of 30 meters by the Rhode and Swartz measurement system and graphed by computer. The FCC limit line calculated by the Part 15 formula for a distance of 300 meters was added to the computer program and then graphed on the same curve. This produced the confusion over the representations shown on the graph. The curve of measured levels is for levels measured at 30 meters while the FCC limit line if for levels measured at 300 meters.

The paragraph under the graph on Page 9 explains the above. Cetecom then used an inverse linear extrapolation rate to show the measured 127 kHz level of 185 uV/m as measured at 30 meters would extrapolate to a value of 18.5 uV/m if measured at 300 meters.

The FCC rules actually permit an extrapolation rate of inverse square in this frequency range. Using the permitted inverse square extrapolation rate, the reported levels for 300 meters would be 20 dB below the levels in the above table or 1.85 uV/m at 300 meters for the fundamental and 0.06 uV/m for the spurious emission at 380 kHz.

One other point I would like to clarify is that Cetecom referenced a frequency of 380 kHz from the graph. A closer examination of the frequency shows it is much closer to 350 kHz that would coincide with the 354 kHz second harmonic of the fundamental.

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