



August 3, 2005

RE: FCC ID: E5MDS-2710AC_ATCB002634

1. FYI - Please note that your cover letter states that the this is to add part 80 "Public Mobile Service". Please note that Part 80 is not the Public Mobile Service but is the Maritime Service rule section.

Response: Understood.

2. Please note that operation under part 80.207(d) in the 216 to 220MHz range is limited to F1B, F2B, F2C and F3C emissions designators. Please note that the only other emissions classes allowed in this range are for radiotelephony using G3D, G3E, INMARSAT, and radiodetermination using A1D, A2D, F1D, F2D, G1D and G2D. Please note that F1D and F2D are only allowed in this range for radiodetermination transmitters. Please also note that F3D is not an allowed emissions designator for part 80 transmitters in this range. Please also note that footnote 20 (other type digital emissions) only applies to the 156 to 162MHz range for radiotelegraphy. The 731 form shows that this particular device has emissions designators of 11K0F3D, 9K13F2D, 9K13F1D, 16K8F2D, 16K8F1D. Also, this transmitter is stated to be a data modem and does not appear to be a radiodetermination device. Please explain how a data modem such as this device meets the Part 80 requirements. Please point to the specific section under the Part 80 rules that would allow this type device in the Maritime Service.

Response: Our Client contacted the NRTC and here are their own words "Bell 202 modem in analog mode would be a typical use" the Bell 202 is an old technology analog modem that uses the external modem setting on the 2710, it is an external 4 wire audio input to our radio. Simply a setting in the radio "modem none," allows the 2 tone old analog modems to operate.

Part 80.207 lists authorized emissions in the 216-220MHz band as F1D and F2D for AMTS applications and references part 80.385B. This part simply lists the available AMTS frequencies, so it will be fine listing these emission designators on the grant. For the Class II change please only include the F1D and F2D for the part 80 portion on the grant. I have uploaded a revised 731 form stating only F1D and F2D designators.

Regards,

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JM/dmg