



GE MDS

175 Science Parkway, Rochester, New York 14620 USA
(585) 242-9600 Phone
(585) 242-9620 Fax
August 17, 2018

FEDERAL COMMUNICATIONS COMMISSION
7435 Oakland Mills Road
Columbia, MD 21046
U.S.A.

Subject: GE MDS LN900 Part 90 / RSS-119 frequency stability attestation

Applicant: GE MDS LLC
Product: LN900 digital transceiver
FCC ID: E5MDS-LN900-1

Dear Sir/Madam,

The LN900 operates between 896-960MHz, in channel bandwidths of 6.25kHz, 12.5kHz, 25.0kHz and 50kHz. All frequencies in this range allow a fixed station frequency stability requirement of ≥ 1.0 ppm except, under FCC Part 90 and IC RSS-119, sub-bands 896-901MHz and 935-940MHz.

All transmit operation in a normal running LN900 network is governed by a Media Access Control Protocol. The MAC uses distributed control functionality between the AP and all other radios in the network, such that the transmissions of stations act to automatically control the emissions and operation of other stations in the system. As such all stations function as control stations, as defined in Part 90.7.

FCC Part 90.213 footnote 14 (applicable to 896-901MHz) and IC RSS-119 section 5.3 footnote 6 (applicable to both 896-901MHz and 935-940MHz), each state that control stations may operate with the frequency tolerance specified for associated mobile frequencies.

Thus, the applicable sub-bands and relaxed minimum frequency tolerance are provided below:


| Frequency Range | FCC Minimum ppm | IC Minimum ppm |
|-----------------|-----------------|----------------|
| 896-901 MHz | 1.5 | 1.5 |
| 935-940 MHz | 0.1 | 3 |

The measured frequency stability of 0.3ppm meets the minimum frequency stability for each sub-band, *except* Part 90 935-940MHz. See separate exhibits describing why the stability can be 0.3 ppm for this band..

This letter serves as attestation supporting evidence for the frequency stability.

If you have any queries, please do not hesitate to contact me at 585 242-8440.

Yours truly,

Signed:  Name: Dennis McCarthy

Dennis McCarthy
Agency Compliance Engineer
GE MDS LLC
175 Science Parkway
Rochester NY 14620
Dennis.McCarthy2@GE.com