



175 Science Parkway, Rochester, New York 14620 USA
(585) 242-9600 Phone
(585) 242-9620 Fax
July 30, 2004

FEDERAL COMMUNICATIONS COMMISSION

7435 Oakland Mills Road
Columbia, MD 21046
USA

Subject: Part 90.203(e) MPE Compliance Attestation
Applicant: Microwave Data Systems Inc.
Product: MDS ROR 220 Data Transceiver
Model: MDS-ROR220
FCC ID: E5MDS-ROR220

Dear Sir or Madam:

This FCC part 90 licensed application, transceiver is having a Class 2 Permissive change applied for to include "portable" operation. MDS will ensure that the OEM integrators maintain strict MPE compliance, this is detailed in the users manual. Used in the OCU "Operator Control Unit" application the antenna gain is fixed to 0dBi and the RF output power is software coded to +32 dBm.

"For portable applications, the ROR220 module will be installed inside a customer's OCU unit. OCU unit's will vary slightly in size and form, but due to the physical packaging requirements, in every case, the distance between the antenna and human body be greater than 5cm.

The ROR220 is used in a TDMA-based system employing 47 timeslots in a one second interval. For portable operation the transmitter functions in one of two modes of operation.

Mode #1 transmits in one timeslot per second. (2.13% duty cycle)

Mode #2 transmits in two timeslots per second. (4.26% duty cycle)

The ROR220 is certified for 2watts maximum power (+33dBm). For portable operation, the device will be calibrated for +32dBm. (1db less than max. power)

For portable operation at Max. Power:

Mode #1 (2.13%*2watts) = 43mw

Mode #2 (4.26%*2watts) = 85mw.

In summary, for portable operation, the device operates below 2watts and has an average power well below 400mw.


Based on this information, we request that the FCC allow MDS to modify its grant notes (via a Class II permissive change) to allow portable operation subject to the restrictions above. Specifically:

Portable use of E5MDS-ROR2202 is permitted only when each of the following conditions are met:

- 1) Maximum power output is 2watts or less.**
- 2) Maximum time-averaged power output is 85mw or less.**
- 3) Minimum distance between the antenna and the human body is 5cm or more."**

MDS will ensure all of the OEM integrators will be supplied with of the "portable" OCU application limitations.

Yours sincerely

Signed:  Name: Dennis McCarthy

Dennis McCarthy

Agency Compliance Engineer

Microwave Data Systems

175 Science Parkway

Rochester NY 14620

Phone (585) 242-8440

Email dmccarthy@microwavedata.com