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LAW OFFICES

KELLER AND HECKMAN LLP

1001 G STREET, N.W.
SUITE 500 WEST
WASHINGTON, D.C. 20001
TELEPHONE (202) 434-4100
FACSIMILE (202) 434-4646

25 BOX BLANCK
N-1000 BETHLEHEM
TELEPHONE (610) 644-0570
FACSIMILE (610) 644-0560

WWW.KHLAW.COM

JOSHUA K. KELLE
JENNIFER H. HOGAN
WILLIAM H. BOGGS
FALCON G. HADY
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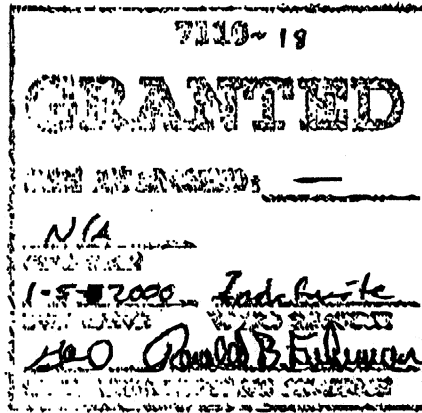
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To	Ray Kowalski	From	Gary Devlin		
Co./Dept.		Co.	FCC		
Phone #		Phone #	(717) 338-2618		
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January 4, 2000

(202) 434-4230
kowalski@khlaw.com



Via Fax to: 717-338-2689
Mr. Gary Devlin
Wireless Telecommunications Bureau
Federal Communications Commission
Gettysburg, Pennsylvania

Re: Adaptive Broadband
Request for Interpretation of §90.733(c) of the Rules.

Dear Mr. Devlin:

On behalf of Adaptive Broadband, a manufacturer of high quality microwave radio equipment, this is to request the Commission's interpretation of §90.733(c) of the rules. The rule states:

§90.733 Permissible operations.

(c) For operations requiring less than a 4 kHz bandwidth, more than a single emission may be utilized within the authorized bandwidth. In such cases, the frequency stability requirements of §90.213 do not apply, but the out-of-band emission limits of §90.210(f) must be met.

Adaptive Broadband believes that the rule means that if the radio operates in less than 4 kHz bandwidth, the equipment need not meet the frequency stability requirements that would otherwise apply, so long as the signal stays within the appropriate emission mask.

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Confusion arises because the rule discusses the use of more than one emission. However, we believe it makes no sense to interpret the rule to mean that the use of multiple emissions is a *condition* for exemption from the frequency stability requirements. Rather, we believe that this language simply confers the right to use more than one emission, *in addition to* the exemption from the frequency stability requirements, when the radio uses less than 4 kHz bandwidth and the signal remains within the authorized emission mask.

Adaptive Broadband manufactures a line of equipment that operates in 2.8 kHz, well inside of 4 kHz. The signal produced by the equipment meets the appropriate emission mask. Accordingly, it is our belief that the frequency stability requirements of §90.213 do not apply to this equipment.

We would greatly appreciate the Commission's confirmation of this interpretation.

Sincerely,



Raymond A. Kowalski
Counsel to Adaptive Broadband

KELLER AND HECKMAN LLP

BOULEVARD LOUIS SCHMIDT 87
B-1040 BRUSSELS
TELEPHONE 32(2) 732-5280
TELECOPIER 32(2) 732-5392

1001 G STREET, N.W.
SUITE 500 WEST
WASHINGTON, D.C. 20001
(202) 434-4100

TELECOPIER: (202) 434-4653

DATE: January 10, 2000

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TO: NAME: Jack Schanker

FIRM/COMPANY:

CITY/STATE/COUNTRY: Rochester, NY

TELECOPIER PHONE NO: (716) 242-8427

CONFIRMATION NUMBER: (716) 242-8454

FROM: NAME/ID NO: Raymond A. Kowalski/459/MI10346

PHONE NO: (202) 434-4230

MESSAGE: Jack, as requested. Ray.

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