

**American Telecommunications Certification Body Inc.**  
6731 Whittier Ave, McLean, VA 22101

July 06, 2001

RE: Schlumberger Resource Management

FCC ID: F9CCMM1303  
F9C25-1962

I really want to move on these Applications and am not willing to make you or your client wait any additional time for a response. I have thought long and on your proposed Grant notes and I am convinced that this is not the appropriate way to go. The TCB process was set up to handle "routine" equipment authorizations only. In the case of RF exposure we are given a set of "canned" statements, which are deemed appropriate for most equipment. And the Commission has made it very clear they do not want deviations by the TCBs from that text

The definitions of Fixed, Mobile and Portable are very arbitrary. Fixed devices are placed on outdoor permanent structures at least two (and sometimes 10) meters away from all persons. Portable devices concern themselves with the near-field phenomenon associated with the maximum power density of jumbled E and H fields as they leave a radiating structure. At in-between distances you have the "Mobile" designation – or devices that operate with safe distances from 20 cm (~7 inches) to 2 meters (~6.5 feet).

We cannot mix our apples and oranges – if you claim a device is fixed and to be used on outdoor permanent structures, then you are expected to keep it 2M or more away from people. If we use the definition Mobile, then it will be safe to be used at distances of 20 cm or more.

I propose we use the original Grant notes without changes.

Bill



William H. Graff  
Examining Engineer  
President and Director of Engineering  
<mailto:whgraff@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.