

December 8, 2000

By Federal Express and Electronic Submission

Mr. Errol Chang
Federal Communications Commission
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21046

Re: *Schlumberger Resource Management Services, Inc.*
Response to Request for Further Information
FCC ID: F9C-262101296
Reference No.: 16532

Dear Mr. Chang:

We are writing in response to your request for further information concerning an application to transfer the FCC Identification number of device F9C-262101296. On behalf of Schlumberger Resource Management Services, Inc. ("Applicant"), in August and September, 2000, we submitted applications to change all of the FCC Identification numbers held by CellNet Data Systems, Inc. ("CellNet"), grantee code H6N, to Applicant's grantee code, F9C. The purpose of these applications was to notify the Commission that Applicant purchased the assets of CellNet, including its equipment authorizations. Pursuant to the direction of Richard Fabina, Chief, Equipment Authorization Branch, the submissions consisted of a separate Form 731 for each of the devices and a single Form 159, which included payment for a single fee intended to cover all of the FCC Identification number transfers.

On October 5, 2000, we received e-mail correspondence from you requesting further information regarding F9C-262101296. Specifically, you informed us that the original filing reflected a different output power from the output power reported in the September 2000 application. After further discussion with Mr. Fabina, we now provide additional information pursuant to section 2.933 of the Commission's rules. Specifically, we enclose an exhibit

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responding to section 2.933 with related attachments, including copies of photographs of the device, a sketch of the new label for the device, a copy of the Form 731 previously filed electronically with an exhibit describing the transaction and an attachment describing a correction to the reported output power, a copy of the Form 159 filed on behalf of Applicant and submitted for all of the equipment authorizations related to the transaction, and a copy of your e-mail sent requesting further information. We are also submitting all of the above materials and a copy of this letter electronically.

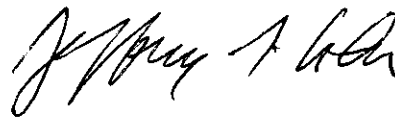
Regarding section 2.933(b)(5), referencing the photographs required by section 2.1033(b)(7), as mentioned above, we are providing photographs of the exterior appearance and a sketch of the new label to be used in future production. The positioning of this new label on the device will not change from the positioning of the old label.

With respect the output power, device F9C-262101296 is a digital device, (Class B), which is an unintentional radiator and thus has no output power level, as illustrated by the attached copy of the original grant. The output power reported in the application submitted on September 5, 2000, and the amended output power reported by an attachment submitted on September 21, 2000, incorrectly indicated the power levels of the intentional radiators located within the same enclosure.

Should you have any questions regarding this matter, please contact Zachary Zehner at (202) 383-3424 to expedite resolving any outstanding issues regarding the pending application.

Sincerely,

WILKINSON BARKER KNAUER, LLP

A handwritten signature in black ink, appearing to read "Jeffrey S. Cohen".

By: Jeffrey S. Cohen
Zachary A. Zehner

Enclosures

Exhibit

The following exhibit represents the “attached statement” and information required by section 2.933(b) of the Commission’s rules for an application for an equipment authorization where no change in design, circuitry, or construction is involved:

1) Original Identification Used Prior to Change in Identification (section 2.933(b)(1)):

H6N-262101296.

2) The Date of the Original Equipment Authorization (section 2.933(b)(2)):

October 17, 1996. See attachment for copy of original equipment authorization.

3) How the Equipment Bearing Modified Identification Differs from Original Equipment (section 2.933(b)(3)):

The equipment bearing the modified identification does not differ from the original equipment.

4) Whether the Original Test Results Continue to be Representative of and Applicable to the Equipment Bearing Changed Identification (section 2.933(b)(4)):

The original test results continue to be representative of and applicable to the equipment bearing the changed identification.

5) The Photographs Showing Exterior of Appearance of Equipment (section 2.933(b)(5)):

See attachment.

**FEDERAL COMMUNICATIONS
COMMISSION**
WASHINGTON, D.C. 20554

**GRANT OF EQUIPMENT
AUTHORIZATION
Certification**

CellNet Data Systems
125 Shoreway Road

San Carlos, CA 94070

Date of Grant: 10/17/1996

Application Dated: 06/05/1996

Attention: Forrest Fulton

NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID ONLY for the equipment identified hereon for use under the Commission's Rules and Regulations listed below.

FCC IDENTIFIER
Name of Grantee

H6N262101296
CellNet Data Systems

Equipment Class: Part 15 Spread Spectrum
Transmitter

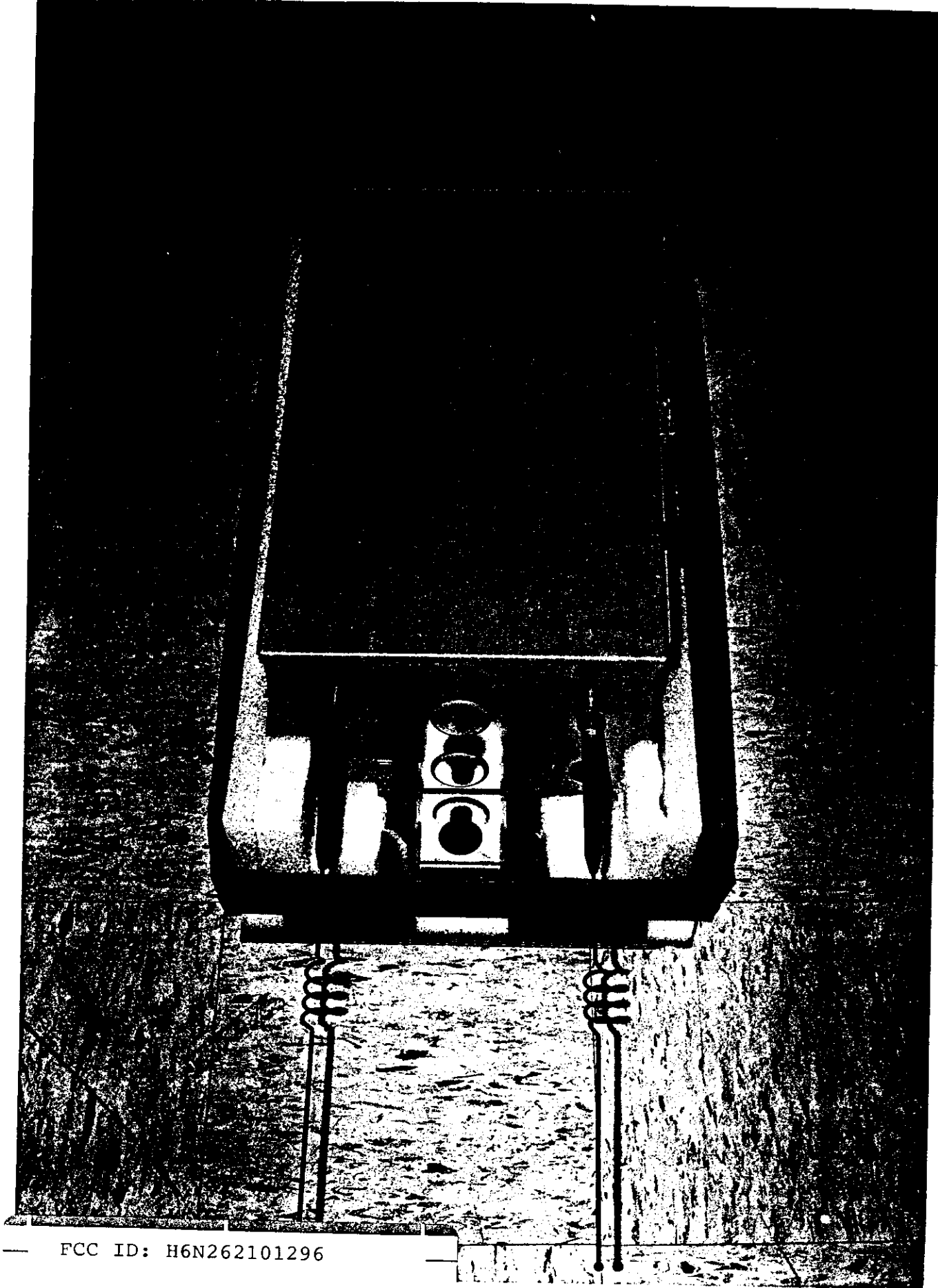
Notes: Utility Company Data
Collection Transceiver
Maximum Output Power: 600
mW This device must be
professionally installed.

<u>Grant Notes</u>	<u>FCC Rule Parts</u>	<u>Frequency Range (MHZ)</u>	<u>Output Watts</u>	<u>Frequency Tolerance</u>	<u>Emission Designator</u>
36 37	15	905 - 923		%	

- 36: Certain antennas used with this equipment require a minimum cable length, or have output power limitations as documented in the application.
- 37: This device has shown compliance with new rules adopted under Docket 87-389 and is not affected by Section 15.37, transition rule.

Mail To:
Gaspara Lim,
Inchcape Testing Services
2 Davis Drive
Belmont, CA 94002

9606138315620001



— FCC ID: H6N262101296 —

Installation Dates

4/22/92 221
4/22/92

TYPE 1
ENCLOSURE

TYPE 1
ENCLOSURE

UL
LISTED
7-15-88

CELLNET
DATA SYSTEMS, INC.

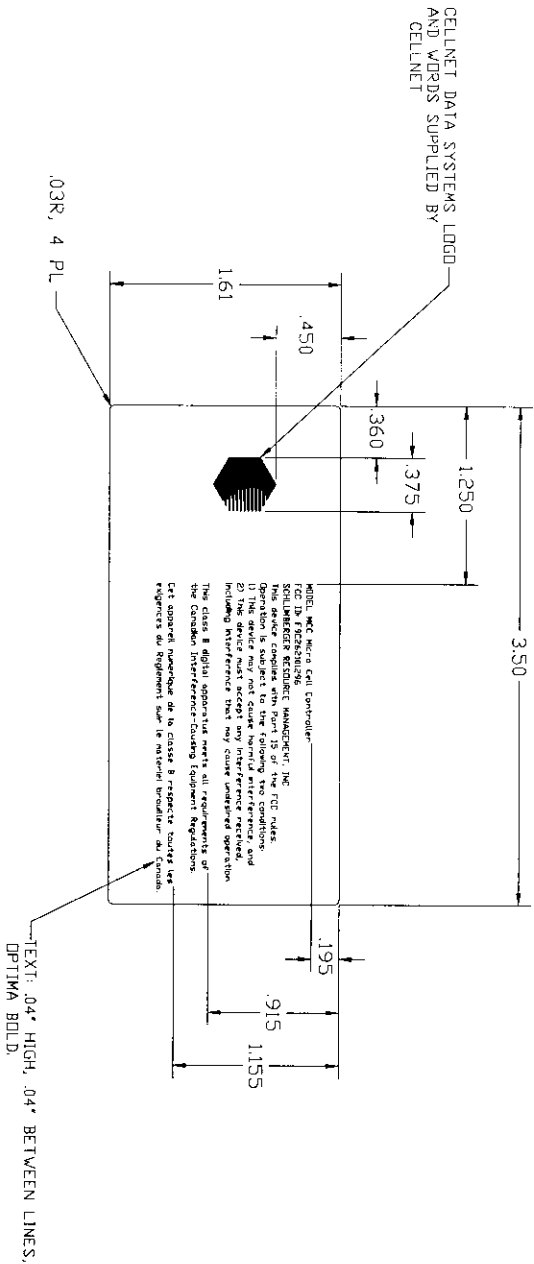
LAN
TRANSCIVER

POWER
CLK LOCK
RF LOCK
SERIAL IN
SERIAL OUT
EXT IN
EXT OUT
DATA READY
TRANSMIT

SUPA REMOTE R0110
E0000 149- 00000000

NO DOCUMENT CONTAINS PROPRIETARY INFORMATION AND SHALL NOT BE REPRODUCED, REPRODUCED, OR TRANSMITTED IN ANY FORM OR BY ANY MEANS, ELECTRONIC OR MECHANICAL, INCLUDING PHOTOCOPYING, RECORDING, OR BY ANY INFORMATION STORAGE AND RETRIEVAL SYSTEM.

REVISIONS		DATE	APPD
REV	ZONE	DESCRIPTION	
A		INITIAL RELEASE PER ECD/ECN #796	6/96
B		REVISED PER ECD # 1109	6/99
C		REVISED PER ECD #	12/00



- NOTES:
1. MATERIAL: .007" THICK GE LEXAN TYPE HP92W WITH 3M #468 TYPE ADHESIVE WITH PROTECTIVE BACKING.
 2. BACK PRINT BLACK TEXT AND GREY ANSI 61 COLOR BACKGROUND.
 3. ANY NON SPECIFIED MATERIAL MUST BE APPROVED IN ADVANCE, IN WRITING, BY CELLNET ENGINEERING.

UNLESS OTHERWISE SPECIFIED, CONFORM TO:		125 SHOREWAY ROAD SAN CARLOS, CA 94070 TEL: (650) 508-6000	
DIMENSIONS ARE IN INCHES			
FRACTIONS: DECIMALS ANGLES			
XX.XX ± .05			
XXX.000			
MATERIAL		DRAWN	
SEE NOTE 1		CHECKED	
		DATE	
		5/96	
FINISH		LABEL, MCC FCC	
MATTED SIDE SHOWN			
DO NOT SCALE DRAWING		SCALE 2/1	
		23-2101	
		SHEET 1 OF 1	



Federal Communications Commission

The Form 731 Application You Just Entered Has Been Submitted Successfully to the Laboratory Division. Please Record The Following Information For Future Reference:

If any information has been entered incorrectly on the 731 or 159 form, please contact btaube@fcc.gov for correction rather than submitting a second 731 or 159.

Form 731 Confirmation Number:	EA98646
FCC ID:	F9C262101296
Date of Submission:	Sep 5 2000 11:01AM
Press this button to begin document submission process.	Press this button to go directly to FCC Remittance Form (Form 159).
Proceed to Exhibits Form	Proceed to Fee Form (159)

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*Mail your comments or suggestions (To: btaube@fcc.gov)
FCC - Federal Communications Commission - FCC_731*

Address Line 1: 2300 N Street, NW, Suite 700	P.O.Box:
Address Line 2: 	City: Washington
Country(if foreign address): 	Zip/Postal Code: 20037-1128
E-mail: jcohen@wbklaw.com	

Item 8. * Does this application include a request for confidentiality for any portion(s) of the data contained in this application pursuant to 47 CFR § 0.459 of the Commission Rules? If "Yes" see instructions. ☐ Yes ☒

Item 9. * Does the applicant request that the Commission defer grant of this application pursuant 47 CFR § 0.457(d)(1)(ii)? (See instructions) ☐ Yes ☒
If so, specify date when grant may be issued (MM/DD/YYYY format):

Item 10. Equipment Code: DSS -Part 15 Spread Spectrum Transmitter ☐ * Description of Product as it is Marketed: utility company data collection transceiver

* Equipment will be operated under FCC Rule Part(s): 15

Item 11. * Application is for:
☐ Original Equipment (See instructions)
☒ Change in identification of presently authorized equipment: Original FCC ID: h6n262101296 Grant Date:
☐ Class II permissive change or modification of presently authorized equipment (See instructions)

Item 12. EQUIPMENT SPECIFICATIONS: (See instructions)			
Frequency range in MHz		Rated RF power output in watts	Frequency tolerance
905	923	12.5	

Item 13. Is the equipment in this application:
* (a) a composite device subject to an additional equipment authorization? ☐ Yes ☒
* (b) part of a system that operates with, or is marketed with, another device that requires an equipment authorization? ☐ Yes ☒
If either of the above questions is answered "Yes" complete section 13(c).

(c) The related application:
☐ has been filed at same time as this application under the FCC ID listed to the right
☐ has been granted under the FCC ID listed to the right
☐ is in the process of being filed under the FCC ID listed to the right
☐ is pending with the FCC under the FCC ID listed to the right

Item 14. Name of test firm and contact person on file with the FCC, if different from applicant or contact person:
Firm Name:

First Name: _____ Last Name: _____
 Telephone: _____ Ext: _____ Fax No: _____ E-mail: _____

Read each certification carefully before answering and signing this WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IN SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTITUTION PE 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Item 15. SECTION 5301 (ANTI-DRUG ABUSE) CERTIFICATION:

The applicant must certify that neither the applicant nor any party to the application is subject to a denial of Federal ber 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862 because of a conviction for possession or distribution of a contr definition of a "party" for these purposes.

Does the applicant or authorized agent so certify? ☒ Yes ☐ No

Item 16. APPLICANT/AGENT CERTIFICATION:

I certify that I am authorized to sign this application. All of the statements herein and the exhibits attached hereto, are tr IN accepting a Grant of Equipment Authorization issued by the FCC as a result of the representations made in this appli equipment with the exact FCC ID specified in this application, (2) compliance statement labeling pursuant to the applical applicable technical rules. If the applicant is not the actual manufacturer of the equipment, appropriate arrangements ha production units of this equipment will continue to comply with the FCC's technical requirements.

Authorizing an agent to sign this application, is done solely at the applicant's discretion; however, the applicant remains

If an agent has signed this application on behalf of the applicant, a written letter of authorization which includes informa section 5301 (Anti-Drug Abuse) Certification statement has been provided by the applicant. It is understood that the lette request, and that the FCC reserves the right to contact the applicant directly at any time.

*** Signature of Authorized Person Filing:**

Ben Lyon

Title of auth

Vice President

Complete items below if an agent signs the application

Firm Name: _____ Telephone: _____ Ext: _____ Fax No: _____
 First Name: _____ Middle Initial: _____ Last Name: _____
 Address Line 1: _____ P.O.Box: _____
 Address Line 2: _____
 City: _____ State: _____ Country(if foreign address): Zip/Po _____
 E-mail: _____

NOTE: An asterisk '*' preceding a field indicates it must be completed before this applic:

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*Mail your comments or suggestions (To: btaube@fcc.gov)
 FCC - Federal Communications Commission - FCC_731*

Description of Transaction

On July 17, 2000, we notified the Commission, pursuant to section 2.929(d) of the Commission's rules, 47 C.F.R. § 2.929(d), of the transfer of the equipment authorizations listed below from CellNet Data Systems, Inc. ("CellNet") to Schlumberger Resource Management Services, Inc. ("SRMS").

On May 16, 2000, SRMS consummated its purchase of the assets of CellNet. Accordingly, all equipment authorizations under CellNet's grantee code, H6N, should be transferred to SRMS. SRMS is presently a grantee of equipment authorizations, with grantee code F9C, that are used for purposes very similar to the CellNet authorizations. Specifically, both Schlumberger and CellNet have manufactured equipment designed to provide automatic utility meter reading services using fixed and mobile data networks. Therefore, SRMS can adequately ensure and accept responsibility for continued compliance of the CellNet authorizations with the FCC's regulations.

Pursuant to FCC staff instruction from Mr. Richard Fabina, we have prepared a separate Form 731 application for each FCC ID number. We are also submitting a single fee, in the amount of \$940, with the first application, which serves to cover all application fee requirements with respect to all FCC ID numbers involved with this transaction.

The following equipment authorizations are to be transferred to SRMS:

H6N-26112495
H6N-26113097
H6N-262101296
H6N-CCM-92-STD
H6N-CMM1100
H6N-CMM1101
H6N-CMM1102
H6N-CMM1200
H6N-CMM1301
H6N-CMM1305
H6N-CMM1400
H6N-CMM1401
H6N-CMM2100
H6N-CMM2200
H6N-CRR-95-STD
H6N-CRR-96-STD
H6N-RTOMM-9
H6N-SCM3100
H6N-TOMM-11E
H6N-TOMM-44E

**Federal Communications Commission****Confirmation Number: EA98646****FCC ID: F9C262101296****Thu Sep 21 15:11:38 EDT 2000**

Status	File Size (bytes)	File Description	Exhibit Type	File Format
	3511	Amendment to power level	Cover Letters	WordPerfect

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Mail your comments or suggestions (To: btaube@fcc.gov)

FCC - Federal Communications Commission -

The Rated RF power output in watts for this equipment should be 1.35 rather than 12.5.

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING (1) LOCKBOX #358315		FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE PAGE NO. _____ OF _____ AUG 3 1999 FCC/MELLON		APPROVED BY OMB 3060-058 STAMP AND RETURN	
SECTION A - Payer Information					
(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) Wilkinson Barker Knauer, LLP				(3) TOTAL AMOUNT PAID (dollars and cents) \$940.00	
(4) STREET ADDRESS LINE NO. 1 2300 N Street, N.W., Suite 700					
(5) STREET ADDRESS LINE NO. 2					
(6) CITY Washington				(7) STATE DC	(8) ZIP CODE 20037-1128
(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 202-783-4141				(10) COUNTRY CODE (IF NOT IN U.S.A.)	
If payer name and the applicant name are different, complete Section B. If more than one applicant, use continuation sheets (Form 159-10).					
SECTION B - Applicant Information					
(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card) Schlumberger Resource Management Service					
(12) STREET ADDRESS LINE NO. 1 1600 Alabama Highway 229					
(13) STREET ADDRESS LINE NO. 2					
(14) CITY Tallassee				(15) STATE AL	(16) ZIP CODE 36078
(17) DAY TIME TELEPHONE NUMBER (INCLUDING AREA CODE) 334-283-6555				(18) COUNTRY CODE (IF NOT IN U.S.A.)	
SECTION C - Payment Information					
(19A) FCC Call Sign/Other ID	(20A) Payment Type Code(PTC) EGC	(21A) Quantity 1	(22A) Fee Due for (PTC) in Block 20A \$940.00	FCC USE ONLY	
(23A) FCC CODE 1 F9C26112495		(24A) FCC CODE 2 13EA98587			
(19B) FCC Call Sign/Other ID	(20B) Payment Type Code(PTC)	(21B) Quantity	(22B) Fee Due for (PTC) in Block 20B	FCC USE ONLY	
(23B) FCC CODE 1		(24B) FCC CODE 2			
(19C) FCC Call Sign/Other ID	(20C) Payment Type Code(PTC)	(21C) Quantity	(22C) Fee Due for (PTC) in Block 20C	FCC USE ONLY	
(23C) FCC CODE 1		(24C) FCC CODE 2			
(19D) FCC Call Sign/Other ID	(20D) Payment Type Code(PTC)	(21D) Quantity	(22D) Fee Due for (PTC) in Block 20D	FCC USE ONLY	
(23D) FCC CODE 1		(24D) FCC CODE 2			
SECTION D - Payer and Applicant Information					
(25) PAYER TIN 0521264167		(26) Complete this block only if applicant name in B-11 is different from payer name in A-2 APPLICANT TIN 0 510204865			
SECTION E - Certification					
(27) CERTIFICATION STATEMENT I, Jeffrey S. Cohen, certify under penalty of perjury that the foregoing and supporting information (PRINT NAME) are true and correct to the best of my knowledge, information, and belief. SIGNATURE <u>Jeffrey S. Cohen</u>					
SECTION F - Credit Card Payment Information					

Wilkinson Barker Knauer, LLP
2300 N Street N.W., Suite 700
Washington, D.C. 20037-1128

16-3 00012
540

58726

Date 08/29/00

\$940.00

PAY Nine Hundred Forty and 00/100 Dollars

TO THE
ORDER
OF

FEDERAL COMMUNICATIONS COMMISSION

RIGGS BANK, N.A.
LINCOLN OFFICE
WASHINGTON, D.C. 20006

AUTHORIZED SIGNATURE

⑈058726⑈ ⑆054000030⑆ 08451252⑈

Constantine, Jason

From: oetech@fccsun07w.fcc.gov
Sent: Wednesday, October 11, 2000 4:18 PM
To: jcohen@wbklaw.com
Subject: Information requested

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Errol Chang
echang@fcc.gov
FCC Application Processing Branch

Re: FCC ID F9C262101296
Applicant: Schlumberger Resource
Management Services Inc.
Correspondence Reference Number: 16532
731 Confirmation Number: EA98646
Date of Original E-Mail: 10/11/2000

There is a difference in output power between the original and the present filing. This will require a complete filing - please comment.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

DO NOT reply to this e-mail by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, in order to expedite processing, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. 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 e-mail address listed below the name of the sender.