

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037-1128
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com

JEFFREY COHEN
202 383-3369
jcohen@wbklaw.com

December 22, 2000

By Federal Express and Electronic Submission

Mr. Joe Dichoso
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-CMM1102
Reference No: 16846

Dear Mr. Dichoso:

We are writing in response to your request for further information concerning an application to transfer the FCC Identification number of device F9C-CMM1102. On behalf of Schlumberger Resource Management Services, Inc. ("Applicant"), in August, 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 the 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 30, 2000, we received e-mail correspondence from you requesting further information regarding F9C-CMM1102. Specifically, you requested that we provide all items required by section 2.933 of the Commission's rules, external photographs of the device and all antennas, and an exhibit indicating compliance with RF safety requirements. After further discussion with Mr. Fabina, we now provide additional information pursuant to section 2.933, we also enclose a copy of an external photograph of the device, a sketch of the new label, a copy of

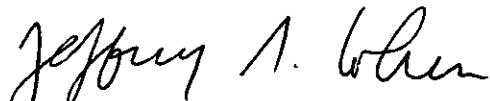
the Form 731 previously filed electronically with an exhibit describing the transaction, a copy of the Form 159 filed on behalf of Applicant and submitted for all of the equipment authorizations related to the transaction, and a copy of your e-mail requesting further information. We are also submitting 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), we are providing the photographs of the exterior appearance of the device. The device is a Part 15 utility meter and does not include any external antennas. We also provided 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 to your request for exhibit indicating compliance with RF safety requirements, section 1.1307(b)(1), of the Commission's rules, which is referenced by section 15.247(b)(4), categorically excludes Applicant from the requirement to conduct a routine environmental evaluation for RF exposure for the subject device. The Part 15 device is not listed in subsection 1.1307(b)(1) Table 1 or in subsection 1.1307(b)(2), and therefore falls into the excluded category. Accordingly, the Commission's rules do not require the submission of an RF evaluation.

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



By: Jeffrey S. Cohen
Zachary A. Zehner*

Enclosures

* Practice limited to matters and proceedings before federal courts and agencies.

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-CMM1102.

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

March 30, 1999. See attachment for copies of original equipment authorizations.

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.



**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:	EA98833
FCC ID:	F9CCMM1102
Date of Submission:	Sep 21 2000 5:16PM
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)

[FCC Home Page](#) | [Search](#) | [Commissioners](#) | [Bureaus/Offices](#) | [Finding Info](#)

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

FEDERAL COMMUNICATIONS COMMISSION - FCC FORM 731
APPLICATION FOR EQUIPMENT AUTHORIZATION

Approved by:
 3060 - 0057
 Expires 9/30

You will be presented with the FCC FORM 159, Fee Remittance Advice after submitting your application and obtaining FCC Form 159, must currently be submitted in paper form along with payment to the address indicated in the FCC Fee] is not currently available.

Item 1. Applicant's complete, legal business name: Schlumberger Resource Management Services Inc.

Item 2. Applicant's mailing address

Line 1: 1600 Alabama Highway 229

Line 2:

P.O.Box:

City: Tallahassee

State: AL Country(if foreign address): Zip/Postal Code: 36078

Item 3. FCC ID: Grantee code: f9c * Equipment Product Code (14 characters maximum): cmm1102

Item 4. Person at the applicant's address to receive grant or for contact:

First Name: Jim

Mail

Last Name: Brennan

Telep

Title:

Fax

E-mail:

Item 5. Instead of Applicant, FCC is authorized to mail original Grant to:

Firm Name:

Address Line 1:

P.O.Box:

Address Line 2:

City:

Country(if foreign address):

Zip/Postal Code:

Person at above address to receive Grant:

First Name:

Last Name:

Title:

Mail Stop:

Item 6. Technical Contact:

Firm Name:

Telephone:

Ext:

Fax No

First Name:

Middle Initial:

Last Name:

Address Line 1:

P.O.Box:

Address Line 2:

City:

Country(if foreign address):

Zip/Postal Code:

E-mail:

Item 7. Non-Technical Contact:

Firm Name:

Telephone:

Ext:

Fax No

Wilkinson Barker Knauer, LLP

202-783-4141

202-78

First Name:

Middle Initial:

Last Name:

Jeffrey

S

Cohen

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 applica 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 lett 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/PC

E-mail:

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

Continue	Clear
----------	-------

FCC Home Page	Search	Commissioners	Bureaus/Offices	Finding Info
---------------	--------	---------------	-----------------	--------------

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

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING (1) LOCKBOX #358315	FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE PAGE NO. <u>1</u> OF <u>1</u> <u>FCC/MELLON</u>			APPROVED BY OMB 3060-058 STAMP RECEIVED FCC/SEC/159
SECTION A - Payer Information				AUG 31
(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.)		
Note: If you are applying for more than one payment, the combinations of (9) and (10) must be unique.				
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 Talladega		(15) STATE AL	(16) ZIP CODE 36078	
(17) DAYTIME 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
(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	
(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	
(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	
(23D) FCC CODE 1	(24D) FCC CODE 2			
SECTION D - APPLICANT INFORMATION (IF DIFFERENT FROM PAYER)				
(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
540 00012

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"

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: 03/30/1999

Application Dated: 02/03/1999

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

H6NCMM1102
CellNet Data Systems

Equipment Class: Part 15 Spread Spectrum
Transmitter

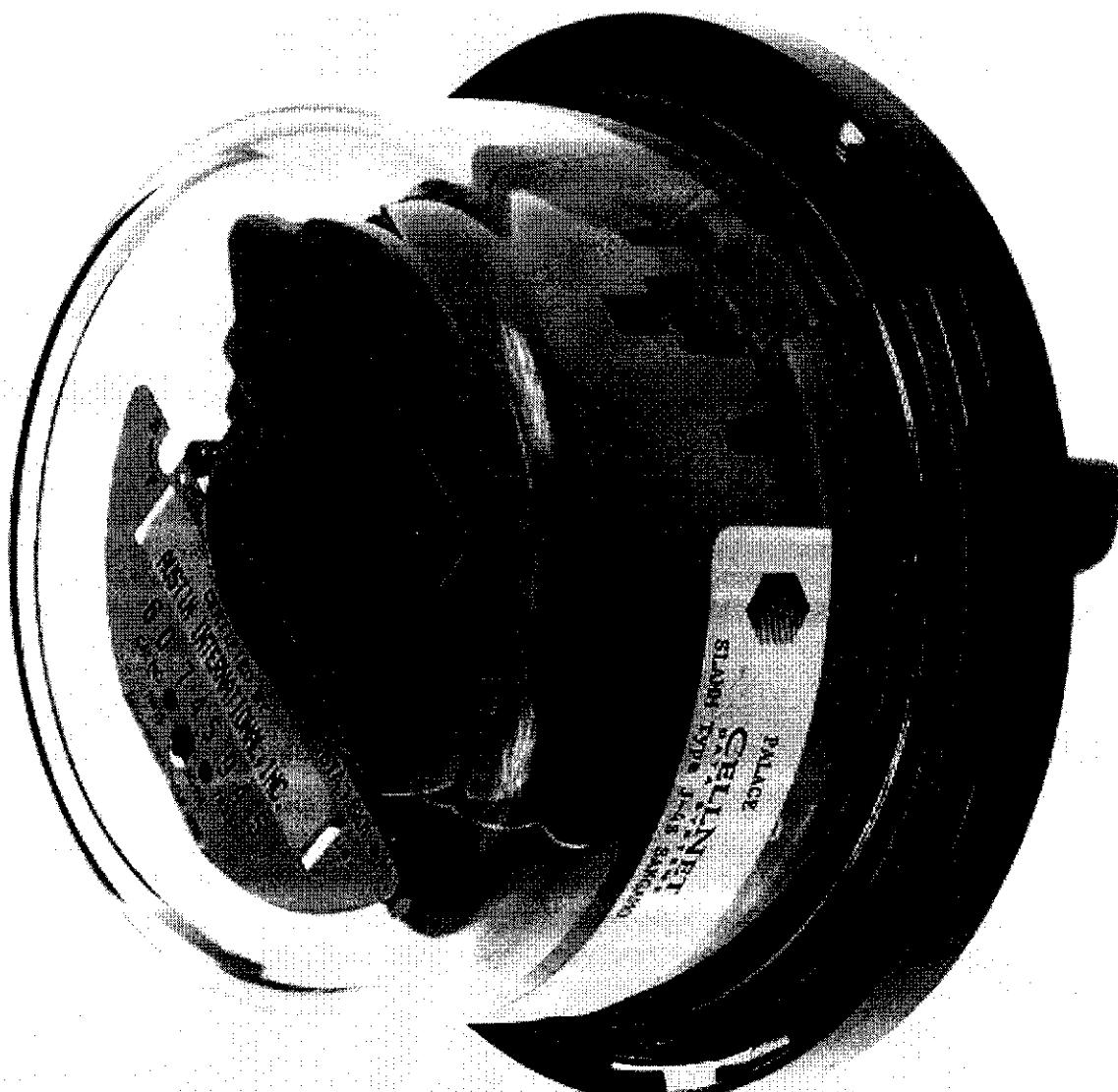
Notes:

<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>
37	15	917.58 - 917.58	0.0724		

37: This device has shown compliance with new rules adopted under Docket 87-389 and is not affected by Section 15.37, transition rule.

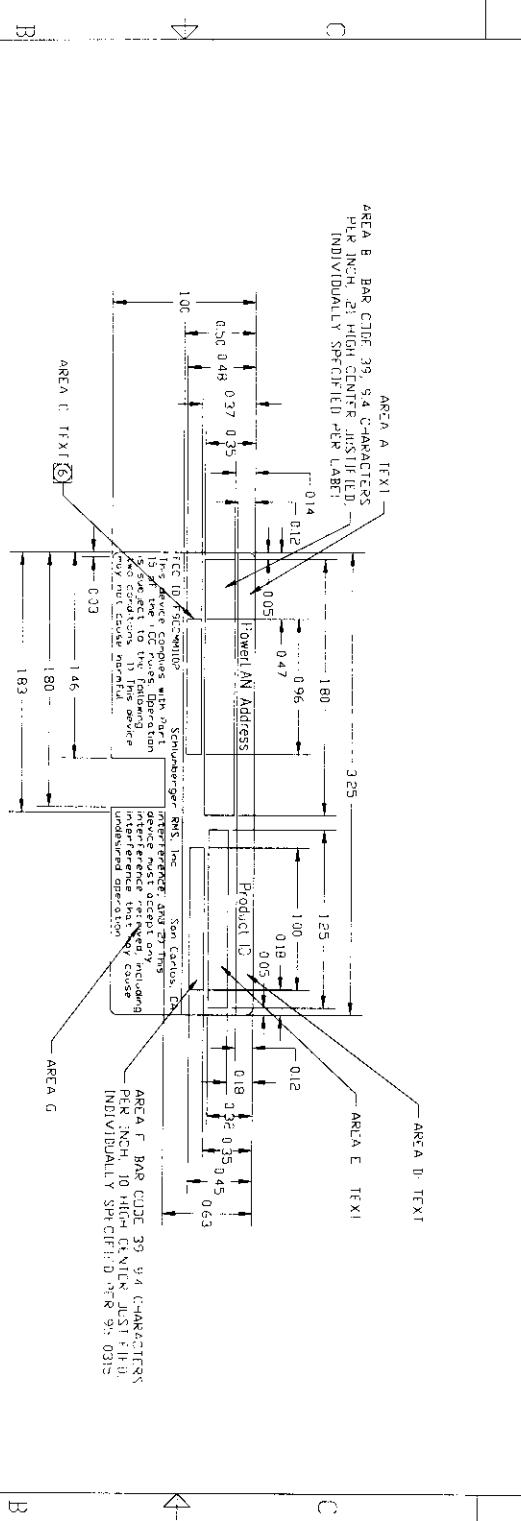
Mail To:

EA93151



Cellnet Data Systems
FCC ID: H6NCMM1102
External View

REVISION		REV. BY		DATE	
INITIAL		S. C. S. - 2000		03/29/99	
REVISED		PDR FCN # 23411		05/29/99	
REAS. BY		MANUFACTURER		100	
B.		REASON		06/09/99	
B.		REASON		12/20/99	



NOTE: MATERIAL 0.02" THICK, WHITE POLYESTER WITH 3M #400 INK ADHESIVE. 3MM
#251 JR EDITION WITH PRINTING ON BACKSIDE.
2. 10P PRINT 3. ACK TEXT AND 4.000" BACKGND. AREAS. A. D. AND G.
BLACK TEXT WITH BACKGROUND AREAS. B. C. AND F. TEXT IN AREAS A.
THREE MUST BE 10" HIGH CENTER JUST BELOW JELLINE. TEXT IN AREA C MUST
BE 10" HIGH. JUST BELOW JELLINE. BOLD WITH 0.25" SPACING BETWEEN.
3. MATERIAL: ACRYLIC GEL MATTE, CLEAR POLYESTER. 3M #773PFI. JR
EQUIVALENT. 1/2" ACRYLIC LAYER.
4. ALL NUMBERED MATERIAL MUST BE APPLIED IN ADVANCE. IN WRITING.
5. COLOR MATCH: JETT 13 CHIP SUPPLIED 3" CELLINE;
6. ACRYLIC POLYESTER MUST BE APPLIED IN 24-HOUR CYCLE. P/N 24-3122

From: oetech@fccsun07w.fcc.gov
Sent: Monday, October 30, 2000 4:30 PM
To: jcohen@wblkaw.com

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Joe Dichoso
jdichoso@fcc.gov
FCC Application Processing Branch

Re: FCC ID F9C0CMM1102
Applicant: Schlumberger Resource
Management Services Inc.
Correspondence Reference Number: 16846
731 Confirmation Number: EA98833

- 1) Please provide all items required by Section 2.933.
- 2) Provide external photo's of the device and all antennas.
- 3) Indicate compliance with the new RF safety requirements, place the exhibit in the RF exposure info folder of the electronic filing.

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.