

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 S. COHEN
202 383-3369
jcohen@wbklaw.com

January 31, 2001

By Federal Express and Electronic Submission

Mr. Steve Dayhoff
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-CMM1200
Reference No.: 16591

Dear Mr. Dayhoff:

On behalf of Schlumberger Resource Management Services, Inc. ("Applicant"), we are writing to supplement our response to your request for further information concerning an application to transfer the FCC Identification number of device H6N-CMM1200 to F9C-CMM1200. On December 15, 2000, we electronically and manually filed a cover letter with accompanying attachments responding to the requests you made on October 16, 2000 via e-mail correspondence (Reference No. 16591).

Pursuant to the direction of Mr. Richard Fabina, Chief, Equipment Authorization Branch, and of Kwok Chan, Engineer, Technical Research Branch, and in response to your requests, we are submitting the attached information concerning the RF emissions of device F9C-CMM1200.

Steve Dayhoff
January 31, 2001
Page 2

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*

Enclosure

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

RF Emissions Statement

The instant device, a Part 15 spread spectrum transmitter, is a fixed device professionally installed inside an enclosed utility meter. Accordingly, the device is not designed to be used by any person. The antenna associated with the device is not external but is rather also contained within the same utility meter enclosure. The device communicates with a fixed local area network.

This transmitter does not fit within the definition of a “mobile device” set forth in section 2.1091(b) of the Commission’s rules, 47 C.F.R. § 2.1091(b), because it is designed to be used in fixed locations. In addition, the transmitter does not meet the definition of a “portable device” contained in section 2.1093(b), because it is not designed to be used by any person. Furthermore, section 1.1307(b)(1), which is referenced by section 15.247(b)(4), categorically excludes this Part 15 device from the requirement to conduct a routine environmental evaluation for RF exposure since the device is neither a millimeter wave device, nor an unlicensed personal communications service device.

In any event, based on the maximum output power (+30 dBm) and antenna gain information contained in the underlying equipment authorization application for this device, the emissions for the device are well below the maximum exposure limits set forth in sections 1.1310 and 2.1093(d). Furthermore, the device only emits approximately six very brief transmissions in any given one-half hour period, each with a duration approximately 0.0027 seconds. Accordingly, the RF emissions for the device are well within the limits set by the Commission.