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January 31, 2001

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-CMM1305
Reference No.: 17803

Dear Mr. Dichoso:

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-CMM1305 to F9C-CMM1305. On December 29, 2000, we electronically and manually filed a cover letter with accompanying attachments responding to the requests you made on October 30, 2000 via e-mail correspondence (Reference No. 16837). Subsequently, on January 23, 2001, we received e-mail correspondence requesting a statement indicating compliance with the RF safety requirements.

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-CMM1305.

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". The signature is written in a cursive, flowing style.

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.