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December 13, 2000

Mr. Steve Dayhoff  
Ms. Jaunice Green  
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-CRR96STD  
Reference Nos.: 16665 and 16600.

Dear Mr. Dayhoff and Ms. Green:

We are writing in response to your requests for further information concerning the application to transfer the FCC Identification number of device F9C-CRR96STD. On behalf of Schlumberger Resource Management Services, Inc. ("Schlumberger"), 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 Schlumberger's grantee code, F9C. The purpose of these applications was to notify the Commission that Schlumberger purchased the assets of CellNet, including the equipment authorizations. 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 16, 2000, we received e-mail correspondence from Ms. Green requesting the submission of an application (Form 731), an exterior photograph of the device, a copy of a label with the new FCC Identifier, and information pursuant to sections 2.933(a) and 2.929(d) of the Commission's rules. On October 18, 2000, we received e-mail correspondence from Mr.

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Dayhoff also requesting an exterior photograph and a copy of an RF Exposure Evaluation conducted for the device pursuant to section 2.1091 of the Commission's rules.<sup>1</sup>

Schlumberger has determined to utilize the verification procedures for newly manufactured equipment, as provided for in section 101.139(b).<sup>2</sup> For equipment including H6N-CRR96TD that is currently authorized under the former notification process, Schlumberger has determined not to change the FCC Identifier. Accordingly, we withdraw the application, Form 731 Confirmation Number EA98828, filed on September 20, 2000, for this device, and thus your inquiries related to this application are now moot.

In Mr. Dayhoff's e-mail correspondence of October 18, 2000, he requested the submission of a copy of the RF evaluation pursuant to section 2.1091. As an initial matter, the device, a Part 101 Licensed Non-Broadcast Station Transmitter, is not a "mobile device" as contemplated under section 2.1091(b). Furthermore, this device is categorically excluded from the requirement to perform a routine environmental evaluation for RF emissions pursuant to section 1.1307(b)(1) Table 1.

We are also submitting this letter electronically within 60 days of your e-mail inquiry. Should you have any questions regarding this matter, please contact Zachary Zehner at (202) 383-3424 to expedite resolving any outstanding issues.

Sincerely,

WILKINSON BARKER KNAUER, LLP



By: Jeffrey S. Cohen  
Zachary A. Zehner

Enclosures

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<sup>1</sup> A copy of each e-mail correspondence is attached.

<sup>2</sup> See *Amendment of Parts 2, 15, 18 and Other Parts of the Commission's Rules to Simplify and Streamline the Equipment Authorization Process for Radio Frequency Equipment*, ET Docket No. 97-94, *Report & Order*, 13 FCC Rcd 11415 (1998) ("Streamlining Order").

## Constantine, Jason

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**From:** oetech@fccsun07w.fcc.gov  
**Sent:** Wednesday, October 18, 2000 11:27 AM  
**To:** jcohen@wbklaw.com  
**Subject:** Technical Exhibits

**To:** Jeffrey Cohen, Wilkinson Barker Knauer, LLP  
**From:** Steve Dayhoff  
sdayhoff@fcc.gov  
FCC Application Processing Branch

**Re:** FCC ID F9CCRR96STD  
**Applicant:** Schlumberger Resource  
Management Services Inc.  
**Correspondence Reference Number:** 16665  
**731 Confirmation Number:** EA98828

Please submit a photograph of the general appearance of the referenced equipment, and a copy of the RF Exposure Evaluation pursuant to Section 2.1091 of the FCC Rules.

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](http://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.

**Constantine, Jason**

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**From:** oetech@fccsun07w.fcc.gov  
**Sent:** Monday, October 16, 2000 12:30 PM  
**To:** jcohen@wbklaw.com

**To:** Jeffrey Cohen, Wilkinson Barker Knauer, LLP  
**From:** Jaunice Green  
jygreen@fcc.gov  
FCC Application Processing Branch

**Re:** FCC ID F9CCRR96STD  
**Applicant:** Schlumberger Resource  
Management Services Inc.  
**Correspondence Reference Number:** 16600  
**731 Confirmation Number:** EA98828

Change of Identification, refer 98796

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](http://www.fcc.gov), Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, 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.

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