

American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

June 12, 2001

RE: DTC Communications
FCC ID: H25LB1

I have a few items that need a bit of attention before I can issue a Grant.

- 1.) FYI: Page 1 paragraph 2.10033(a) is not needed for the TCB process.
- 2.) Your own data for Occupied Bandwidth at shows failing data at $F_c \pm 12$ KHz. Please be aware that, as you so correctly stated, you must be down 50dBc at the ± 12.5 KHz points.. Please note that for 90.210(d) Mask D a resolution bandwidth of 100 Hz should be employed.
- 3.) Was transmitter radiated spurious emissions performed using the substitution method per TIA./EIA 603? This is now an FCC requirement.
- 4.) Please provide radiated ERP measurement at the carrier frequency using substitution method
- 5.) Please be sure your Occupied Bandwidth modulation is representative of the emission designators for which you are seeking approval. For DTMF usually the mix of the two highest tones [i.e. DTMF # or C] is sufficient. You also show a triple tone component in your report. Without seeing it, I cannot be sure what it is. In addition, I would like to see something which is representative of the your PON modulation.
- 6.) Is there any difference in the radiated spurious emissions produced by PON or F3W?
- 7.) Even though this is a low power device, you will need a more thorough RF safety consideration than presented in this first go-round. Please refer to OET Bulletin 65, Equations for Predicting RF Fields [pp.19]. Re-arrange these equations solving for R based on your measured radiated power. The limits for General Population/Uncontrolled Exposure [pp. 67] must be used. Copies of this document can be had from the OET website at <http://www.fcc.gov/oet> . Please be sure RF exposure warning statements appear in the manual.

Because of its low power, I would like to propose using 90.217 as the basis for Certification. This would make the difficulties in meeting Mask D irrelevant, and the Transient Frequency Behavior test not applicable. It would also allow you to relax your frequency tolerance and deviation levels. The only item you will still have to maintain closely is Tx Radiated Spurious.. If this idea meets with your approval let me know.

Regards,

Bill



William H. Graff
Examining Engineer
President and Director of Engineering
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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. 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 sender.