



Elliott Laboratories Inc.  
www.elliottlabs.com

684 West Maude Avenue  
Sunnyvale, CA 94085-3518

408-245-7800 Phone  
408-245-3499 Fax

American TCB

September 24, 2007

RE: Trimble Navigation. FCC ID: JUP-5935524-B1  
Attention: Timothy R. Johnson

Please find our responses to your comments on this application below:

1. FYI...We understand your response regarding labeling. However due to increased FCC concern over inappropriate labeling and TCB's being too lenient on these issues, we have submitted the labeling issue directly to the FCC to obtain final approval for this case. We will let you know if there is any concern from the FCC.

Regarding the labeling, the client submits the following to address your concerns.

“ATCB refers to our installed radio door module as an Access Door, where in fact it is not a door to be accessed but a part of the equipment that we build in our factory at Trimble Dayton.

ATCB asked the FCC about our labeling method. The response from FCC to ATCB on September 19 was that the label must be placed on a permanent part of the device. Trimble takes no issue with that; our position is that the label location on the radio door meets the requirement of being placed on a permanent part of the device because the radio door module is a permanently attached part of the equipment as shipped from our factory. Let me explain.

We designed our GPS receiver with a location for a radio door module to be installed. Our contract manufacturers (Solectron primarily) build GPS receivers and radio door modules separately and ship them to Trimble. Trimble offers a number of different radio door modules that we install in this location at our factory. When we receive a customer order, our fulfillment center (Trimble in Dayton, OH), pulls the appropriate radio door module from stock, pulls the appropriate GPS receiver from stock, completes construction of the unit using Philips screws, labels the final unit, and configures the firmware.

The user does not swap out the radio door modules. These radio modules are installed at the factory. Trimble does not sell radio door modules to users.



Elliott Laboratories Inc.  
www.elliottlabs.com

684 West Maude Avenue  
Sunnyvale, CA 94085-3518

408-245-7800 Phone  
408-245-3499 Fax

Now, this equipment also has a battery door cover, which is intended to be removed by the customer. Clearly we would not want to attach our label to this surface, since it is customer removable.

But there is not an FCC requirement that the customer be unable to dismantle the equipment. If there were, there are hundreds of Bluetooth and Wi-Fi products with only plastic snap-on enclosures out there, which are easier to dismantle than to remove all screws from our radio door module.”

Thus, the label on the radio door module does fulfill the requirement of permanently attached to the equipment and complies with the guidelines at [http://www.fcc.gov/oet/ea/Labelling\\_Guidelines\\_Parts\\_15\\_and\\_18.pdf](http://www.fcc.gov/oet/ea/Labelling_Guidelines_Parts_15_and_18.pdf).

2. This device has been requested to be Certified as a whole unit, not a module. Therefore complete internal photographs showing the top/bottom of all boards must be provided (see previous comments 6 & 7). It still appears that we are missing many photographs. This should also include a photograph of the Bluetooth with shield removed. Please provide.

Trimble has provided additional photographs of the unit that should help you understand the structure of the unit and the various parts therein. Note, the bluetooth module does not have a shield. These photographs have been uploaded.

Item #3 of your comments will be addressed separately.

Regards,

A handwritten signature in black ink that reads "David W. Bare".

David W. Bare  
CTO