

May 4, 2001

**Federal Communications Commission**

7435 Oakland Mills Road  
Columbia, MD 21046

**FCC ID:** K66VX-160V

**731 Confirmation Number:** EA100232

Correspondence Reference Number: 19084

**RE:** Vertex Standard Co., Ltd.

1/ The Confidentiality Fee was paid and the Confidentiality request box on FCC Form 731 was checked. However, none of the Exhibits were marked Confidential and no Confidentiality request letter was received. Please clarify your intentions in this matter.

A confidentially letter was uploaded with the file name: Vertex\_Confidentiality VX-160V.PDF

2/ It appears that this VHF unit does not fit into the operating requirements under Part 95. Please comment.

Vertex would like to exclude filing under Part 95 for this application.

3/ Measurement data for AC line conducted emissions are not required for applications for certification of licensed transmitters. Further, this unit is battery powered.

AC line conducted test was performed while the radio was operated and placed in the battery charger. The test data will be removed from the certification report. A revised test report was uploaded.

4/ Please note that the attenuation requirements for radiated spurious emissions as prescribed under Part 90 are  $43 + 10\text{Log}(P)$  and  $50 + 10\text{Log}(P)$ . This is referenced to the desired signal (as measured) yielding dBc. The attenuation specification is not XX uV/M. The dBc is to be determined from the substitution method as described in the ANSI/TIA/EIA-603-1992 document. Please submit data / results obtained in this manner.

Sec. 10 page 16 of the test report indicates that measurements (radiated spurious emissions) were performed according to procedures ANSI/TIA/EIA-603-1992, section 2.2.12. The reported test data are expressed as ERP in dBm. The margin is in dB. The test data are not expressed in XX uV/M as specified in this correspondence. However, test data have been reformatted in order to be presented in dBc.