



June 29, 2001

Mr. Joe Dichoso  
Federal Communications Commission  
Equipment Authorization Division,  
Application Processing Branch  
7435 Oakland Mills Road  
Columbia, MD 21046

RE: KDZ480628-3700

Dear Joe:

This letter is in response to your request for information concerning a Class II permissive change application to the above referenced FCC ID. The following information addresses Mr. Kwok Chans concerns.

**Items 1 & 2**

The table below is updated to add the Cushcraft 15dBi Yagi antenna that was inadvertently left off in the original file. Also, I have added the MPE safe distances based on the EIRP of the system. All installation manuals, where applicable, will be updated to include instructions to install these antennas so that the indicated distances will be maintained between the radiating element and the general public.

<b>The following antennas were submitted with the 480628-3700 radio for FCC Testing</b>					
<b>MANUFACTURER</b>	<b>MODEL</b>	<b>LXE PART NUMBER</b>	<b>TYPE</b>	<b>GAIN (dB)</b>	<b>MPE DISTANCE (cm)</b>
EMS*	Spire	155846-0001	Omni	6	3.63
EMS*	Spire	155845-0001	Omni	3	2.57
Cushcraft	S2400BFNM	153325-0001	Omni	0	1.82
Cushcraft	S2406PBLKNH-06	481246-2400	Patch	6	3.63
Cushcraft	S2403NM	153600-0001	Omni	3	2.57
Cushcraft	PC2415	460601-3020	Yagi	15	10.24
Lucent Technologies	None	480426-0425	Omni	2.5	2.37
Cushcraft	RTN2400SXR	153180-0001	Omni	0	1.82
Xeterx	245BD5W	480424-3411	Patch	4&6	3.63
Lucent Technologies	None	155520-0001	Patch	0	N/A
LXE	None	155522-0001	Omni	0	N/A
LXE	None	155526-0001	Patch	0	N/A
LXE**	2330	155814-0001	Patch	0	N/A
Mobile Mark**	OD9-2400	480424-0411	Omni	9	1.99

\* Part numbers have changed. 155581-0001 is now 155846-0001 and 155582-0001 is now 155845-0001. No electrical changes, same form, fit and function.

\*\* The Mobile Mark and the 2330 patch antennas are listed, however they are still pending.

The antennas that have an "N/A" in the MPE column are for portable, handheld or body worn devices and are exempt from the MPE and SAR requirements as defined Supplement C of OET bulletin 65. They are exempt because the total EIRP of the system is 42mW.



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**Item 3**

The letter referenced by Mr. Chan did not come from LXE. I suspect Timco engineering sent it on behalf of LXE. We do not claim to maintain a distance of 1 meter for all antennas. We do however, stipulate to maintain the distances defined in the table above for each antenna.

**Item 4**

The antennas, from the above table, we wish to re-certify with standard connectors are:

- 1) Cushcraft S2400BFNM - This antenna has 2 LXE part numbers for each gender of connector. LXE P/N: 153325-0001(Female) and 153179-0001(Male).
- 2) Cushcraft S2406PBLKNH-06 - This antenna's LXE part number is 481246-2400.
- 3) Cushcraft S2403NM - S2400BFNM - This antenna has 2 LXE part numbers for each gender of connector. LXE P/N: 153599-0001(Female) and 153600-0001(Male).
- 4) Cushcraft PC2415 - This antenna has 2 LXE part numbers for each gender of connector. LXE P/N: 460602-3020(Female) and 460601-3020(Male).

Additionally, the Mobile Mark OD9-2400, LXE P/N: 480424-0411 will also use a standard connector and is also installed professionally by LXE trained engineers.

**Item 5**

I have spoken with Mr. Chan directly on this issue. Based on our conversations, my understanding is that our portable, handheld or bodyworn devices are exempt from MPE and SAR requirements according to Supplement C of OET bulletin 65. This supplement indicates that environmental evaluations are not typically required for devices under 500mW of power. Our devices have a system maximum EIRP of 42mW.

I respectfully request that the condition be removed in its entirety.

**Item 6**

If the condition is removed, no warning statements are required.

**Item 7**

Noted. I have a thorough understanding of the RF safety requirements as a result of this experience.

Sincerely,

R. Sam Wismer  
RF Approvals Engineer