

To: Morton Flom, P. Eng.
M. Flom Associates, Inc. – Global Compliance Center
3356 North San Marcos Place, Suite 107
Chandler, Arizona 85225-7176

From: John Cameron
Pacific Crest Corporation
990 Richard Ave., Suite 110
Santa Clara, California 95050

Subject: Certification of KEAPDL4535 per 90.203(j)(2) and (3)

Dear Morton Flom, P.E.:

On the morning of May 4, 1999, I spoke via telephone, with George Tannahill, an Examiner for the FCC, regarding the compliance of our model PDL4535 with regards to FCC rule part 90.203(j)(2) and (3). In this conversation, George confirmed that "a product that transmits data at a rate of 19,200 bits per second and fits in a channel bandwidth of 25 kHz, satisfies the efficiency standard of 90.203(j)(3) which states; "the equipment must be capable of supporting a minimum data rate of 4800 bits per second per 6.25kHz of channel bandwidth".

On May 5, 1999, I sent an email to George Tannahill. My objective with this correspondence was to obtain his above interpretation in writing. I described to him the four modes of operation for our 35W, data (only) transmitting, model PDL4535 as follows:

Mode 1: Transmits data at 19.2kbps fitting within 25kHz channel bandwidth (4-Level FSK)
Mode 2: Transmits data at 9.6kbps fitting within 12.5kHz channel bandwidth(4-Level FSK)
Mode 3: Transmits data at 9.6kbps fitting within 25kHz channel bandwidth(GMSK)
Mode 4: Transmits data at 4.8kbps fitting within 12.5kHz channel bandwidth(GMSK)

On May 19, 1999, George responded to my email. I have attached the relevant paragraph:

Pursuant to 90.203(j)(2) there are three types of equipment of this type that we will authorize: (i) 12.5KHz equipment, (ii) 25KHz equipment if it is capable of 12.5KHz operation, and (iii) 25KHz equipment that meets the efficiency standard. In the e-mail "Mode 1" would fall into category (iii). "Mode 2" would fall into category (i). For the other two modes, when radios are approved, we approve them at the maximum data rate. Any reduced rate operation is acceptable as long as the radios still comply. Therefore, for "Mode 3", assuming that mode 1 and mode 3 are in the same radio, operation would be acceptable. The same applies to "Mode 4" assuming mode 2 and mode 4 are in the same radio.

The statement "In the e-mail "Mode 1" would fall into category (iii)" is the confirmation that our product meets the efficiency standard.

Sincerely,

John F. Cameron
Vice President, Pacific Crest Corporation
