

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

SEP 1 1994

IN REPLY REFER TO:

31030/EQU/4-2-4  
1300B4

Mr. Valdis V. Liepa  
University of Michigan  
Radiation Laboratory  
NASA/Center for Space Terahertz Technology  
3228 EECS Building  
Ann Arbor, MI 48109-2122

Dear Mr. Liepa:

This is in reply to your facsimile transmission of August 2, 1994, regarding the labelling of a low power communication device that will be marketed within the U.S. and Canada. You request approval to combine the labels for both countries, permitting a single label to be employed. As indicated, this combined label would read as follows:

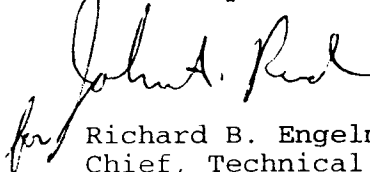
"This device complies with Part 15 of the FCC Rules and with RSS-210 of the Industry Canada. Operation is subject to the following two conditions: (1) This device may not cause harmful interference, and (2) this device must accept any interference received, including interference that may cause undesired operation."

According to Section 15.19(a) of our rules, a low power communications device operating under Part 15 must be labelled with the specific statement contained in paragraph (a)(3). The only difference between the statement required under our rules and your proposed statement is the addition in the first sentence of the phrase "... and with RSS-210 of the Industry Canada."

I note that Kwai Lum of Industry Canada, in a facsimile to you on August 3, 1994, has already given permission to use this combined label. I also agree that the use of this combined label, as shown above, is acceptable under our regulations. This label conveys the desired information and is essentially identical to our requirement. As expressed by Mr. Lum, text denoting compliance with the standards for both countries was not stated in our rules as "it would be too presumptuous [to assume] that all products are for both markets."

I trust that the above responds to your inquiry. Additional questions should be directed to John Reed, 1300B4, at the address on the letterhead or at (202) 653-7313.

Sincerely,



for Richard B. Engelman  
Chief, Technical Standards Branch  
Office of Engineering and Technology

Government of Canada  
Industry Canada

Gouvernement du Canada  
Industrie Canada

FACSIMILE SHEET

FORMULE D'ENVOI PAR TELECOPIEUR

TO/A: Name/Nom.....: Mr Valdis V. Liepa  
Office/Bureau.: Radiation Lab, University of Michigan, USA  
Tel. No./No. de tél.: Fax: 313-747-2106

FROM/DE: Name/Nom.....: Kwai Lum  
Manager, Radio Equipment Standards,  
300 Slater Street, 13th Floor,  
Ottawa, Canada, K1A 0C8  
Phone: 613-990-4699; Fax: 613-952-5108

Total pages : Date & time sent: August 3, 94.  
Pages totales: 1 Date & heure envoyé:

Our Ref : DGEP-5630-1 (RSS-210 Labelling)

This is to respond to your fax of August 1, 94 requesting that we permit a combined statement for FCC and Industry Canada on the equipment labels.

We wish to assure you that your suggested combined label that you submitted in your fax is acceptable to Canada since our standard (section 5.8 of RSS-210) allows (to quote) ".....equivalent statement.....".

We have made our labelling statement as close as we can to Part 15.19(3); the differences are : we left out the word "harmful" because of difficulties in defining what is harmful. We added the phrase "of the device" to remove any possible misunderstanding.

To re-capitulate, although your proposed statement uses FCC text except for the mention of "RSS-210 of Industry Canada", we consider it to be equivalent. Our preferred text is per RSS-210; the next best is to add the word "harmful" to meet FCC requirements.

Since FCC and Industry Canada are from different countries, we do not consider it necessary to state in our separate standards a combined text. In any case it would be too presumptuous that all products are for both markets.

Our equipment certification staff will be informed of the above. We will also copy this to Mr Reed of the FCC since you said that you sent a similar fax to him.

Regards,



Kwai Lum

cc Mr John Reed (FCC OET fax 202-653-8773).  
cc R. Corey (Equipment Certification).

Re: Certification for Siemens Immobilizer  
Models: P207  
FCC ID: M3N-IPATSP207  
CANADA:

POWER OF ATTORNEY

A letter granting Valdis V. Liepa the Power of Attorney is on file and can be provided when so requested.

Re: Certification for Siemens Immobilizer  
Models: P207  
FCC ID: M3N-IPATSP207  
CANADA:

REQUEST FOR CONFIDENTIALITY

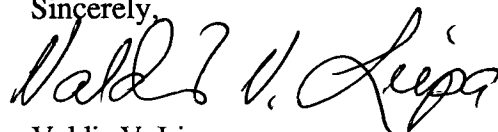
Pursuant to 47 CRF 0.459, Siemens requests that a part of the subject application be held confidential. This comprises Exhibits

and           (5)       Schematics  
              (10)       Parts List (Part of Exhibit only)

Siemens has spent substantial effort in developing this product and it is one of the first of its kind in industry. Having the subject information easily available to "competition" would negate the advantage they have achieved by developing this product. Not protecting the details of the design will definitely result in a financial hardship.

If there are any questions regarding this request, please contact me at the above address or call 647-647-1792, (lab) 734-483-4211, fax 647-647-2106 or e-mail [liepa@umich.edu](mailto:liepa@umich.edu).

Sincerely,



Valdis V. Liepa  
Research Scientist  
University of Michigan

**GENERAL PRODUCT INFORMATION: Ford IPATS**

The IPATS (Integrated Passive Anti-Theft Systems) being certified for the Ford Corporation has been designed by:

Siemens Automotive Corporation  
2400 Executive Hills Drive  
Auburn Hills, MI 48326-2980  
FCC Grantee Code: M3N

under the management of:

Mr. Francis Bonhoure, Manager AT BE AS  
Tel.: (248) 253-2639  
Fax: (248) 253-6635

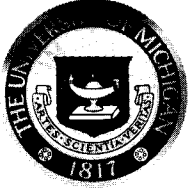
The IPATS will be manufactured by:

Siemens Sistemas Automotrices S.A. de C.V.  
Camino a la Tijera # 3  
Km 3.5 Carretera Guadalajara-Morelia  
C.P. 45640 Mpio. Tlajomulco de Zúñiga, Jalisco  
Mexico

under the management of:

Mr. Sauter, Plant Manager  
Tel.: 011-52-3-818-2000  
Fax: 011-52-3-684-3200

The IPATS will be distributed by the Ford Corporation and will be serviced by its authorized automobile dealers and service shops in the United States of America, Canada and other countries.



THE UNIVERSITY OF MICHIGAN

COLLEGE OF ENGINEERING

THE RADIATION LABORATORY  
DEPARTMENT OF ELECTRICAL ENGINEERING  
AND COMPUTER SCIENCE

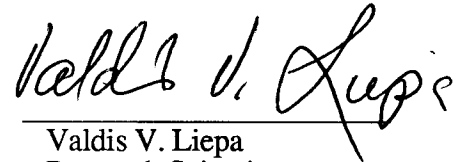
3228 EECS BUILDING  
ANN ARBOR, MICHIGAN 48109-2122 USA  
313 764-0500 FAX 313 747-2106

March 10, 2000

Re: Certification for Siemens Immobilizer  
Models: P207  
FCC ID: M3N-IPATSP207  
CANADA:

STATEMENT OF MODIFICATIONS

There were no modifications made to the Receiver by this laboratory. (Also see Section 3.1 of the attached Test Report).



Valdis V. Liepa  
Research Scientist