

Non-Conformities FCC ID: MI7-M64700G-25 (Ref # E05-000370-1)

The items listed below represent requests for information following review of this application. Further question may arise pending review of responses to these items.

OK	#	Non-Conformity or Comment	Submitted Response	Respondent / Date of Response
X	1	Page 6 of test report declares 20k0F1D. The measured bandwidth is greater than 20kHz, please provide proper emissions designator.	Update test report provided.	2/28/06 CKC Laboratories, Inc.
X	2	Please clarify the spectrum efficiency requirements of 90.535. Please provide an updated users manual incorporating the new equipment specifications.	90.535 requires transmitters of data only systems in the wideband segment to have a spectral efficiency of 384kbps per 150KHz. This spectral efficiency in a channel of 50Khz translates to requirements of 128Kbps. IPMN is fully compliant with a transmission of 128 kbps in 50 KHz.	2/28/06 CKC Laboratories, Inc.
X	3	Please clarify channel usage; does the equipment operate on wideband segments? Is the device capable of operating on "Nationwide" Interoperability channels listed in 90.531(b)(1)? Is the device capable of operating on "General Use" channels listed in 90.531(b)(5) or "State" channels listed in 90.531(b)(6)?	The IPMN device is capable of operation in both 'Narrow band' 25KHz channels and 'Wideband' 50KHz channels. The equipment is capable of operating in both 'State' and 'General' bands.	2/28/06 CKC Laboratories, Inc.
X	4	Does the equipment retain original support only for data input?	The IPMN radio equipment is capable of transporting only IP Data packets.	2/28/06 CKC Laboratories, Inc.
x	5	Please clarify ACCP limits employed. The test report must identify which mask is used to assess compliance. <i>FCC NOTICE: Obtained clarification from Steve Dayhoff 3/15/06 regarding applicability of 50kHz method used here. A copy of this correspondence is located in the operational description exhibit type and is not publicly viewable.</i>	The ACCP limits used by IPMN to test the equipment are derived from the 25KHz Mobile ACP requirements (which are the more stringent ones) . The values are doubled to account for the 50Khz spectrum used. The resulting Table is derived by taking the 25Khz Mobile Transmit ACP table and doubling all the values in the Offset from Center and Measurement Bandwidth and leaving Max ACP relative values as they appear in section	2/28/06 CKC Laboratories, Inc.

			90.543 (e.g. first set of values would therefore be offset of 31.5 KHz instead of 16.625 and bandwidth of 12.5KHz instead of 6.25. The -40dBc is the same relative measurement needed to satisfy these ACP requirements.	
X	6	Please provide statement regarding encryption. If encryption is supported, provide a declaration of compliance with 90.553(a) & (b) and to Project 25 encryption protocol listed in 90.553(b). Please describe which channels may employ encryption; note encryption is allowed on all channels except nationwide calling only interoperability channels. Please describe method used to disable encryption (user must be able to disable encryption).	IPMNC radio does not employ and encryption at the radio level. Any modification to the on air data steam (including Encryptions) may be added by the end user.	2/28/06 CKC Laboratories, Inc.
INCOMPLETE See Next NC.	7	Please supply the following as applicable: Attestation of data rate efficiency compliance for wideband data channels listed in 90.531(c) - 90.535(c); Attestation of data rate efficiency compliance for General Use and State channels only 90.535(b); Attestation of Data Interoperability Channel operation for wideband data interoperability channels listed in 90.531(c)(1); Attestation of operation on Nationwide Data Interoperability channels listed in 90.531(b)(1)(i) only or 90.547(a)(2); Attestation of compliance to Project 25 Data Overview (ANSI 102) standards for operation on data interoperability channels listed in 90.531(b)(1)(i) only –or 90.548(a)(2).	IPMN herby attest that the on-air data rate of the equipment is 64k when operating in a 25KHz channels (either state, general) IPMN herby attest that the on-air data rate of the equipment is 128K when operating in a 50KHz wideband channels. IPMN herby attest that this data rate is the result of using 16000 symbols per second and 16 levels FSK (4 bite per symbol) for 25KHz and using 32000 symbols per second and 16 levels FSK (4 bite per symbol)for 50KHz. IPMN herby attest that is has licensed and co-developed project 25 Data only capabilities for the 700 MHz radio per ANSI 102 standard.	2/28/06 CKC Laboratories, Inc.

Non-Conformities FCC ID: MI7-M64700G-25 (Ref # E05-000370-2)

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OK	#	Non-Conformity or Comment	Submitted Response	Respondent / Date of
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				Response
x	1	Parts of question 7 from last correspondence were left unanswered. Please provide attestation of compliance for operation on A) data interoperability channels listed in 90.531(b)(1)(i). B) wideband data interoperability channels listed in 90.531(c)(1) For reference: 90.531(b)(1)(i):Narrowband data Interoperability channels. The following channel pairs are reserved nationwide for the express purpose of data transmission only: 279/1239, 280/1240, 921/1881, and 922/1882. 90.531(c)(1) Wideband Interoperability channels. The following wideband channels are designated for nationwide Interoperability licensing and use, but are not available for licensing or use pending Commission adoption of a wideband Interoperability standard: 28-30, 37-39, 46-48, 73-75, 82-84, 91-93, 148-150, 157-159, 166-168, 193-195, 202-204, 211-213.	In addition to the attestations on the previous email IP MobileNet attests as follows: 1. The MI7-M64700G-25 is compliant with the requirements to operate within the data interoperability channels listed in 90.531(b)(1)(i). 2. The MI7-M64700G-25 is compliant with the requirements to operate within the wideband data interoperability channels listed in 90.531(c)(1). Yours, Eric Tanner Vice President, Operations IP MobileNet Inc.	4/4/06 CKC Laboratories, Inc.