

Intertek Testing Services (ITS) NA, Inc.
70 Codman Hill Road
Boxborough, MA 01719

Attention: Roland W. Gubisch – Chief Engineer, EMC and Telecom

Re: Application for VHF Digital Transmitter (VDT) Certification – FCC ID: MIJCM350V

Mr. Gubisch:

This letter and attached revised Exhibits are in response to your review questions and comments with regards to the CM350V FCC Certification filing. The response or associated reference document is provided below following the details for each question and/or comment.

ADMINISTRATIVE

1. The User Manual contains much information that might be deemed proprietary, including the block and schematic diagrams that are provided separately and are specifically designated to be held confidential.

The entire User Manual can be held confidential, but only if it is not available generally and the equipment is installed only by authorized representatives. This would have to be justified in a revised Confidentiality request.

Response: GD requests that the operations manual be included in the Confidentiality Request. An updated Confidentiality Request Letter is included.

Alternatively, you may wish to consider removing the proprietary and detailed design information in the User Manual, and providing only that information essential to the radio user. In any case, the present User Manual file size exceeds the 4 MB limit of the FCC database.

2. The information required in 2.1033(c)(8) could not be found: "The dc voltages applied to and dc currents into the several elements of the final radio frequency amplifying device..."

Response: This information is now included in Exhibit 12 Revision A.

3. The information required in 2.1033(c)(12) is incomplete. There is one photo showing the interior of the radio. However, there are 2 PCBs and one PCB has a shield over part of the circuitry. Please provide photos of both sides of both PCBs, including a photo of the PCB with the shield removed.

Response: This information is now included in Exhibit 9 Revision A.

TECHNICAL

1. The Form 731 provides an emission designator (A3E) but not the authorized bandwidth. Bandwidths of both 8.33kHz (5K60A3E) and 25 kHz (6K00A3E) are authorized in this frequency band for A3E emissions.

Response: This information is now included in an update to Form 731.

2. Note that operation on 8.33 kHz spaced channels is not authorized within US-controlled airspace (see note 17, 87.137(a) table).

GENERAL DYNAMICS

C4 Systems

7/1/2008

Response: Yes, we are aware that operation on 8.33kHz spaced channels is not authorized within US-controlled airspace per Note 17 of 87.137(a) table. This can also be noted in the Grant of Equipment Authorization comments if necessary.

3. This information required in 2.1047 (modulation characteristics) is not found. Please provide the curves described in 2.1047. This information is different from EN 300 676 modulation test reporting requirements.

Response: This information is now included in Exhibit 6 Revision A.

4. The information required in 2.1049 (occupied bandwidth, 99% power) is not found.

Response: This information is now included in Exhibit 6 Revision A.

5. The User Manual indicates that this equipment is capable of digital modulation such as D8BPSK. This appears to be a combined amplitude and phase modulation apparently not allowed in the 118-137 MHz band. The only alternative to double sideband amplitude modulation apparently allowed in this band is phase modulation. Please explain.

Response: Yes, although this equipment has this capability, we understand this modulation scheme is not allowed in the 118-137 MHz band and will not be used in the US. This can also be noted in the Grant of Equipment Authorization comments if necessary.

Please contact me by telephone at (480) 441-3725 or via email at Gil.Estrella@gdc4s.com if there are any further questions or additional information needed regarding this filing.

Sincerely,

Gil O. Estrella /s/
Gil Estrella
EMC Engineer
GDC4S