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Federal Communications Commission.  
Equipment Authorization Div.  
Application Processing Branch  
7435 Oakland Mills Road  
Columbia MD 21045

**Subject: Transmission duty cycle of CNI-930M**

To Whom It May Concern;

According to Mobitex protocol, the maximum size of a packet for one-time transmission is 7,736 bits, and the data rate is 8 kbps. Therefore, transmission time at the maximum, or 'the worst case condition' is 0.967 sec. ( $7,736/8000= 0.967$ )

Mobitex is a data communication network based on packet transaction, and its protocol allows for the individual device to control the packet transaction time.

Based on the facts given above, we will modify the duty factor algorithm so that the device calculates in every packet transaction, and ensures the duty limitation is within 8.13%. However, with the modified algorithm, the device will perform transmission without having the fixed duration windowed time averaging of 320 sec.

In Summary, we will remove the fixed duration windowed time averaging from the duty factor algorithm. Instead, we will change the algorithm to perform duty limitation based on the calculation whenever it transmits a packet.

If you have any question, please contact us immediately.

Best Regards,

A handwritten signature in black ink that reads 'Cali Kim'. The signature is written in a cursive, flowing style.

CALI Kim  
Marketing Manager