

SIEMENS

To: Federal Communications Commission
Washington, D.C. 20554

Date: November 1, 2010

Mr. Rashmi Doshi, Mr. Raymond LaForge,

We are pleased to present you the test reports for our newly developed SITRANS LR560 Level Probing Radar. This Level Radar is operating in the 77 GHz to 81 GHz band according to the amendment of Part 15 of the Commission's Rules per granted waiver as stipulated in the Notice of Proposed Rulemaking and Order dd January 14 and 19, 2010 in FCC 10-14.

According to the above mentioned publication sections 19 to 24, among others, you request information regarding in-situ test results and seek comments on the made proposals. Attached reports show bench results as well as in-situ results obtained by two accredited test labs. In line with the request for information we have included in-situ test results for four (4) different applications. Besides metal and concrete tank installations also test results are included for a plastic tank and a sand pile application. At this moment we request you to treat the sand pile application for information purposes only.

Some remarks regarding the test data included in this submission might answer your potential concerns. In particular a pre-scan result in the RFI global report on page 20 shows a peak level at 3 m of 58.2 dBuV/m at 6.5 GHz. It should be noted that a limit of 74 dBuV/m should have been depicted while mistakenly the average limit of 54 dBuV/m was shown. On pages 13 and 14 of the same report in band emissions on the bench show emissions below 78 GHz and above 79 GHz. The emissions below 78 GHz are actually not present and are image responses from the external mixer that was used. The emissions above 79 GHz are actually present for a small fraction of a msec as a result from residual charge on the transmit power line while the PLL falls out of lock immediately after sweep completion. Finally, as noted in the Ultratech report the conditions to apply pulse desensitization are not met for this low duty cycle FMCW radar.

Siemens would appreciate you to consider the in tank in-situ applications for your grant of equipment authorization. In case you would like to receive any further particular test results regarding the performed tests please inform us.

Respectfully submitted,



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