

To: "tjohnson@AmericanTCB.com" <tjohnson@AmericanTCB.com>  
Subject: FCC ID: NTAXMETER6

**FCC ID: NTAXMETER6**

**In reply to e-mail dated April 15, 2003**

Dear Mr. Johnson,

Below are the answers to your questions.

1. Please find an updated confidentiality letter, submitted via " Upload for application NTAXMETER6 ATCB000369", Additional information folder on April 22, 2003.
2. Please find an updated label information in "TMW-DM\_label\_upd" file, submitted via "Upload for application NTAXMETER6 ATCB000369", Label location folder on April 22, 2003.

3. The following answer was given by Tadiran telematics:

Our device is not defined as Direct Sequence Spread Spectrum device, but as a digitally modulated device and meets, according to our understanding, all relevant paragraphs of 15.247.

The paragraph 15.247(a)(2) defines the minimum 6dB bandwidth of 500kHz for systems utilizing digital modulation technique in the relevant frequency bands. Paragraph 15.247(d) defines, for digitally modulated systems, maximum power spectral density of 8dBm in any 3kHz band. Our device meets all these requirements.

We are not aware of rules requiring any digitally modulated device to utilize data rate of above 1 Mbps. The section 15.407 mentioned in your letter refers to U-NII devices operating in 5 GHz band.

Based on the above, please advice regarding your position.

4. The following answer was given by Tadiran telematics:

The waterMeter transmitter is a factory programmed device. It may operate once in several seconds, or minutes or hours, upon client's request, but in **no** case it will operate with intervals (between successive transmissions) less than 10 s. Programming of the repetition rate is not accessible by the installers or users.

Therefore the transmission mode: 5.5 ms in 100 ms represents the worst case.

5. For testing purposes the device was programmed as following:  
bursts of 26 transmissions (3.5 ms transmission duration and 3 ms interval between successive transmissions) with 834 ms intervals between successive bursts.

This mode of operation allows to maximize emission with respect to antenna height and turntable azimuth and provides the correct testing of the transmitter according to procedures as described in our test report, especially as peak detector was used for measurements.

6. Please find an updated version of the test report (without any mentioning of direct sequence systems). Sorry, I simply did not notice that I used this abbreviation (we have it in our template).

With great respect,  
Valeria