IPS CORPORATION

Page 1 of 5

4593 Hosohora Ono Tatsuno-machi, Kamiina-gun, Nagano-ken, 399-06 Japan Phone: +81-266-46-3856 Fax: +81-266-46-3857

May 12, 1998

PCTEST Engineering Laboratory, Inc. 6660-B Dobbin Road, Columbia, MD 21045 U.S.A

Attention: Mr. Randy Ortanez / President

Reference: FCC Reply for Toko FCC ID: NUSCFO-SS10.

Dear Mr. Ortanez,

Thank you very much for your cooperation. Following is our first reply for the request technical information [Correspondence ID: 123], 731 Confirmation Number: EA88675. Please make a first reply letter to FCC and please confirm that reply is enough or not except the items No.2 and 7.

- 1. Please refer the attached theory of operation.
- 2. We will remeasure with peak power meter at end of the May. We will send the data as soon as possible. Please wait a moment.
- 3. Both output power and PSD were measured with conducted. Measurement made at "External Connector" part (Antenna connection part). Refer to the block diagram in the test report.
- 4. The theoretical processing gain (Gp):
 = 101ogW/B=101og22/2=10.413926dB
 B: Bit rate 2Mbps/Ch
 W: Chip rate 22Mbps/Ch
 CFO-SS10 provide multiple carries. However, the processing gain is unchangeable due to the above processing gains were

synthesizing.

- 5. Actual Frequency: 2442MHz (No.5 Center Frequency)
- EUT was verified with FCC Class A digital device.
 The statement Sec.15.247(b)(4) should be indicated on the each mass production unit.
- 7. After measure the out put power, we examine the statement should be necessary or not. However, we would like to know the example statement in accordance with the Sec. 15.247(b)(4). Please inform us.

Please confirm this reply and your kind consideration to this would be greatly appreciated.

Very truly yours,

IPS Corporation.

Takashi Maruyama President and Chief Engineer

G / L #

nneg to gazn:

-86.20MH SHI: 99:8 18 -9 -86

What is CFO-SS?

- CFO-SS is an abbreviation of "Carrier Frequency Offset-Spread Spectrum", which is a kind of synchronous multi-carrier DS CDMA technique and utilizing a single PN (Barker) code commonly assigned to all the multiple carriers. Orthogonality among multiple carriers are achieved by specially selected carrier frequencies.
- CFO-SS employs a receiver with surface acoustic wave (SAW)
 matched filters (or baseband digital matched filters) to achieve
 rapid signal acquisition.
- Good performance is achieved by CFO-SS even under multipath fading environment.
- Hardware is simple. 10 Mbit/s CFO-SS transceiver basically consists of five units of the 2 Mbit/s 2.4 GHz wireless LAN terminal.
 One clock tracking circuit is only required which is shared by five units.
- CFO-SS requires no special equalizing technique.

Submission

Page 5 H. Ishikawa & H. Shinonaga KDD R&D Labs.

January, 1998

Theoretical explanation of the CFO-SS

Correlation peak level

SS signal

Output peak level of the SAW matched filter

SAW matched filter

Af=R: Information band rate [Hz]

The correlation peak value is obtained by the following equation when a frequency offset exists between the carrier frequency of the SS signal and the nominal operating frequency of the SAW matched filter.

 $|Y| = \sin(\pi N T_c X) / \sin(\pi T_c X)$

Y: Amplitude of the correlation peak

Tc: Chip duration [sec]

X: Frequency offset [Hz]

N: Length of the PN code [chip]

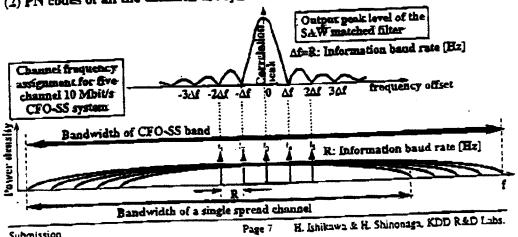
Submission

Page 5 H. Ishikawa & H. Shinonaga, KDO R&D Labs.

January, 1998

Principle of CFO-SS scheme

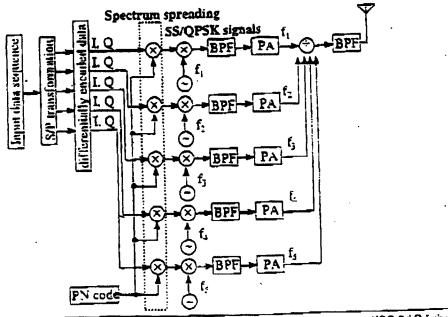
- Correlation peak vanishes at the frequencies specified by the information rate.
- For 10 Mbit's five channel system, minimum channel separation is 1 MHz. However, 2 MHz separation makes the system strong against multipath fading.
- Multiple signals spread by a single PN code can be multiplexed without interfering one another(orthogonality among multiple carriers) if the following conditions (CFO conditions) are simultaneously satisfied.
- (1) The symbol timing in each channel are synchronized with the PN code.
- (2) PN codes of all the channels are synchronized.



Submission

January, 1998

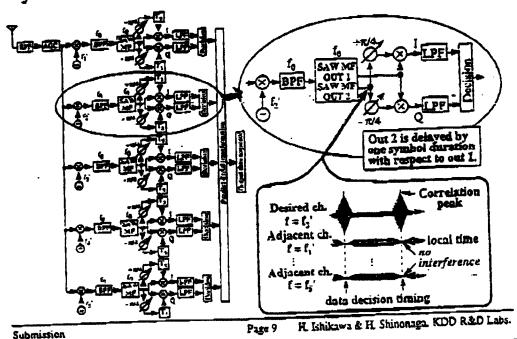
Example transmitter configuration of CFO-SS system with a five channel model



Submission

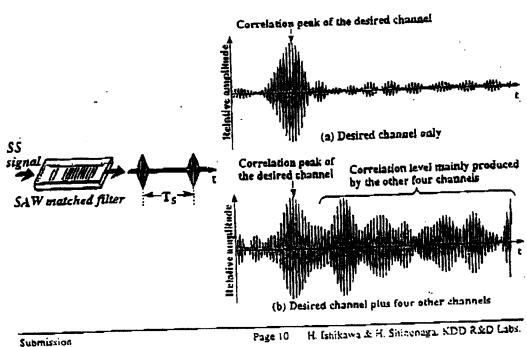
H. Ishikuwa & M. Shinonaga, KDD R&D Labs.

Example receiver configuration of CFO-SS system with a five channel model



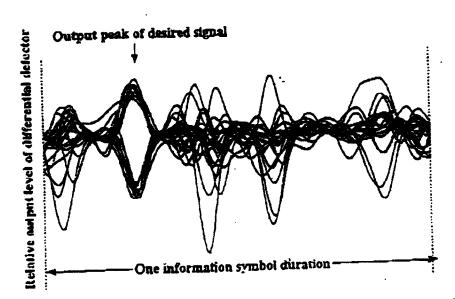
January, 1998

Output waveforms of SAW matched filter



January, 1998

Eye diagram of CFO-SS system when five channels are multiplexed



Submission

H Ishikawa & H. Shinonaga. KDD R&D Labs.

January, 1998

Implementation

- RF/IF complexity
 - 1) RF unit consists of antenna, divider, combiner, power amplifiers and LNA's.
 - 2) IF unit basically consists of five units of the 2 Mbit/s PHYs.
 - 3) One clock tracking circuit is shared by five units.
- Baseband processing complexity
 - 1) Serial-Parallel translator.
- Equalizer complexity CFO-SS does not require a special equalizer.
- Diversity implementation Conventional selection diversity technique is also adequate to CFO-**SS.**

Sebmission

H. Ishikawa & H. Shinonaga KDO R&D Labs.

IPS CORPORATION

Page 1 of 1

4593 Hosohora Ono Tatsuno-machi, Kamiina-gun, Nagano-ken, 399-06 Japan Phone: +81-266-46-3856 Fax: +81-266-46-3857

June 09, 1998

PCTEST Engineering Laboratory, Inc. 6660-B Dobbin Road, Columbia, MD 21045 U.S.A

Attention: Mr. Randy Ortanez / President

Reference: FCC Reply for Toko FCC ID: NUSCFO-SS10.

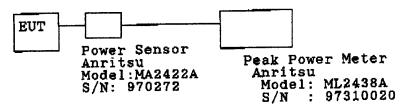
Dear Mr. Ortanez,

Thank you very much for your cooperation. Following is our first reply for the request technical information [Correspondence ID: 123], 731 Confirmation Number: EA88675. Please make a reply letter to FCC.

Item 2. Re-measurement results of the output power with a peak power meter.

9.23mW

<Measurement Block Diagram>



Item 7. Please examine the statement should be necessary or not. And if it is necessary, please inform us of the example statement in accordance with the Sec. 15.247(b)(4).

Please confirm this reply and your kind consideration to this would be greatly appreciated.

Very truly yours,

IPS Corporation.

Takashi Maruyaha President and Chief Engineer

	NUSCFO-								
SECT	ION IV - Enter FC	CID from Page 1, Section	inal Grant to:	(See instruc	ctions)				
1.(a)	Instead of Applicant, FCC is authorized to mail original Grant to: (See instructions) Firm name, PCTEST Engineering Laboratory, Inc.								
	number, street,	6660-B Dobbin Road	,,						
	City, State/Country, ZIP/Postal Code	Columbia, MD 21045							
	4	Columbia, 1410 21043							
	_								
(h)	(b) Name, Title and Mail Stop, if any, of person at above address to receive Grant: (If 1.(a) is completed, this Item must be completed)								
(5)		Randy Ortanez, Preside	ent						
2.(a)	Technical contact:	PCTEST Engineering Laboratory, Inc. Randy Ortanez			(b) Telepho	one No. (Area/Cour	itry/City code, No	o. and Ext.)	
2.(0)	Firm name, contact person, number, street,				(4	(410) 290-6652			
					(c) FAX N	(c) FAX No. (Area/Country/City code and No.)			
	City, State/Country,	6660-B Dobbin Road	•		(4	10) 290-665	54		
	ZIP/Postal Code	Columbia, MD 21043				,			
(d)	nternet e-mail address: randy@pctestlab.com							o and Ext)	
(e)	Non-Technical contact:				(f) Telepho	(f) Telephone No. (Area/Country/City code, No. and Ext.)			
(0)	Firm name,	PCTEST Engineering Laboratory, Inc.				(410) 290-6652			
	contact person, number, street,	Randy Ortanez				(g) FAX No. (Area/Country/City code and No.)			
	City, State/Country, ZIP/Postal Code				(41	0) 290-6654			
	ZIP/Postal Code	Columbia, MD 21045						``	
(h)	Internet e-mail addr	ess: randy@pctestlab.co	om		e data contair	and in this	<u> </u>		
3.	Does this application include a request for confidentiality for any portion(s) of the data contained in this application include a request for confidentiality for any portion(s) of the data contained in this application pursuant to 47 CFR §0.459 of the Commission's Rules? If "Yes" see instructions.								
4.	Does the applicant request that the Commission defer grant of this application pursuant to Yes No 47 CFR §0.457(d)(1)(ii)? (See instructions)								
5.	Type of equipment authorization requested: (check one box only) X Certification Type Acceptance Notification								
		one box only)	ons page 4)	(b) Equipme	nt will be ope	rated under FCC	Rule Part(s):		
6.(a)	6.(a) Equipment Code and description. (establishment Code and description. 15 247: Subpart C								
		Freq. Offset-Spread Spectrum, Wirel	ess Modem	l	,, 0	<u> </u>			
7. Application is for: (Check one box only)									
Σ	[X] 1) Original 2. Change in identification of presently additional education of presently additional educ				or mod	odification of presently			
equipment (See instructions)						authorized equipment (See instructions)			
	(See instructions) ORIGINAL FCC ID Grant date (S						ee mstraction		
- Constructions (See instructions)									
8. (a	a) Frequency range	(b) Rated RF power output	(c) Frequer	ncy tolerance z, ppm	(d) Emiss (See 47 CFR §	ion designator \$2.201 and §2.202)	num	ber	
	in MHz	in watts	~,,,,	2, pp					
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244	12 MHz					·			
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	Is the equipment in	this application:	is application:					[V] Na	
 Is the equipment in this application: (a) a composite device subject to more than one type of equipment authorization? 							Yes	X No	
(b) part of a system that operates with, or is marketed with, another device that							Yes	X No	
,	requires a	n equipment authorization?					LJ 163	فتين	
	If either of the	above questions is answered "	Yes" complete	items 10.(a) ar	nd (b). (Se	e instructions)	CC Form 731	- Page 2 of	