

RE: FCCID: NVJAR8200MK3B Manufacturer's ID: AR8200MKIIIB

This is to address questions raised relative to the AOR AR8200MKIIIB handheld receiver, pertaining to compliance with the following sections of Part 15.121(a)(1) & (2).

Sec. 15.121 Scanning receivers and frequency converters used with scanning receivers.

(a) Except as provided in paragraph (c) of this section, scanning receivers and frequency converters designed or marketed for use with scanning receivers, shall:

(1) Be incapable of operating (tuning), or readily being altered by the user to operate, within the frequency bands allocated to the Cellular Radiotelephone Service in part 22 of this chapter (cellular telephone bands). Scanning receivers capable of ``readily being altered by the user'' include, but are not limited to, those for which the ability to receive transmissions in the cellular telephone bands can be added by clipping the leads of, or installing, a simple component such as a diode, resistor or jumper wire; replacing a plug-in semiconductor chip; or programming a semiconductor chip using special access codes or an external device, such as a personal computer. Scanning receivers, and frequency converters designed for use with scanning receivers, also shall be incapable of converting digital cellular communication transmissions to analog voice audio.

(2) Be designed so that the tuning, control and filtering circuitry is inaccessible. The design must be such that any attempts to modify the equipment to receive transmissions from the Cellular Radiotelephone Service likely will render the receiver inoperable.

(b) Except as provided in paragraph (c) of this section, scanning receivers shall reject any signals from the Cellular Radiotelephone Service frequency bands that are 38 dB or lower based upon a 12 dB SINAD measurement, which is considered the threshold where a signal can be clearly discerned from any interference that may be present.

(c) Scanning receivers and frequency converters designed or marketed for use with scanning receivers, are not subject to the requirements of paragraphs (a) and (b) of this section provided that they are manufactured exclusively for, and marketed exclusively to, entities described in 18 U.S.C. 2512(2), or are marketed exclusively as test equipment pursuant to Sec. 15.3(dd).

(d) Modification of a scanning receiver to receive transmissions from Cellular Radiotelephone Service frequency bands will be considered to constitute manufacture of such equipment. This includes any individual, individuals, entity or organization that modifies one or more scanners. Any modification to a scanning receiver to receive transmissions from the Cellular Radiotelephone Service frequency bands voids the certification of the scanning receiver, regardless of the date of manufacture of the original unit. In addition, the provisions of Sec. 15.23 shall not be interpreted as permitting modification of a scanning receiver to receiver Cellular Radiotelephone Service transmissions.

Manufacturer's Comments

RE: 15.121(a)(1)

The CPU of the AR8200MKIIIB has been specially designed and programmed for the US domestic market, in compliance with the above regulation. As such, there is no frequency data for the US Cellular frequency band in the processor's programmed data. The CPU is not field programmable, so it cannot be modified by the consumer.

If an operator tries to enter a cellular frequency into the receiver by means of the tuning controls, keypad entry or via PC through the RS-232C serial port, those entries will be automatically ignored (and rejected).

In combination with the above comments, it is just not possible to enable cellular frequency reception through any of the physical modification means described in the regulation, specifically "by clipping the leads of, or installing, a simple component such as a diode, resistor or jumper wire; replacing a plug-in semiconductor chip; or programming a semiconductor chip using special access codes or an external device, such as a personal computer."

RE: 15.121(2)

The Band Pass Filters of the AR8200MKIIIB have no adjustable components (such as variable capacitors or pots), therefore, no readjustments of the manufactured values are possible. Also, there are a significant number of small SMD capacitors used in the circuit. Their presence makes it extremely difficult to alter its characteristics of the receiver.

These components are not readily accessible elements in the product. Near total disassembly of the receiver, including the removal of sub-boards from the main circuit board, is necessary to gain access to the described components, which are on the rear part of the circuit board if the unit is disassembled in the conventional manner. It is also quite likely that any attempts to modify these (BPF) circuits of the receiver would result in damage and/or a serious degradation of the receiver's performance

The Manufacturer certifies the referenced receiver is in compliance with all the applicable regulations contained in the section. Test data from National Certification Labs was forwarded to the Commission and approval of the device was granted by the FCC on October 31, 2002, grant identifier NVJAR8200MK3B.

Sincerely,

/s/ Takashi Nakayama
Executive Vice President
AOR USA, Inc.