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L. S. Compliance, Inc. **MEMO**

Date: **October 25, 2000**

To: **Errol Chang – FCC**

From: **L. S. Compliance, Inc.**
Jim Blaha and Ken Boston

Subject: **Correspondence reference Number: 16491**
731 Confirmation Number: EA96569

Dear Errol,

Section 15.247 (b)(4) states that a Spread Spectrum System should be operated in a manner that ensures Public Safety with regards to R. F. Exposure. This device is a small RF Transceiver in a cabinet which is used to interface to a Radar Gun used for the purpose of checking the speed of a baseball thrown from pitcher to catcher during baseball games. The speed of the pitch is measured and sent via the product to a transceiver in the baseball stadium dugout. In this use, it is judged that the device will be operated at a distance, which is further than 20 cm from the operator, and is therefore classified as a mobile device. This is consistent with the description given in 2.1091(b).

The user is guided to section 1.1307(b)(2), which also references section 2.1091. Section 1.1307 (b)(2), for mobile devices, states that a Part 15 device is categorically excluded from routine environmental evaluation per 2.1091. This particular device operates with an omni-directional antenna, of about 2 dbi gain, and power level of 460 milliwatts at 902 – 928 MHz.

From table 1 of OET Bulletin 65 – supplement C, it can be found that this particular product (less than 2.5W EIRP at 902-928 MHz, 20 cm separation) requires NO - MPE Calculations or special warnings. The owners Manual for this product does contain an Instruction Sheet to the user to “ensure separation of greater than 20cm” during operation. This Instruction Sheet was added as an amendment to this filing on October 18, 2000 as a response to FCC Reference Numbers 16622 and 16621.

Regards,

Jim Blaha and Ken Boston