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January 27, 2000

Mr. Frank Coperich  
Federal Communications Commission  
Office of Engineering & Technology  
Equipment Authorization Division  
7435 Oakland Mills Road  
Columbia, MD 21046

Re: FCC ID OPFE56X21-Y; EA95353

Dear Mr. Coperich:

I am writing in response to your inquiry of December 20, 1999, reference number 11097, concerning the application of Breitling, U.S.A., Inc., for equipment certification for the Breitling Emergency. I have attached the technical information you requested in point 1 (test procedure for ERP reading) (Attachment 1), point 2 (compliance with 47 C.F.R. § 87.139(h)) (Attachment 2), point 3 (compliance with 47 C.F.R. § 87.141(g)) (Attachment 3), and point 5 (circuit diagram) (Attachment 5). Please do not hesitate to contact me if you need any additional clarification.

Point 4 concerns frequency stability down to -30 degrees C. The Emergency is intended to be worn on the wrist; its frequency stability has therefore been tested only to -10 degrees C. Moreover, at -10 degrees C the battery has reached its endpoint. The transmitter stability measurements at -10 degrees C are attached (Attachment 4, page 7).

Point 6 concerns the FAA coordination letter. Breitling has submitted its waiver request to the FAA; the cover letter enclosing the application is attached (Attachment 6). In addition, the Breitling request was referred to the FAA through the Interdepartmental Radio Advisory Committee ("IRAC"), Doc. No. 31189/1.

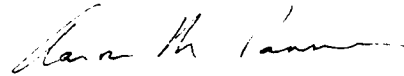
I understand that you will be unable to issue a Grant of Certification until the FCC has granted the required waiver of its rules. Breitling's waiver application is pending with the Wireless Bureau; we appreciate your help in our effort to satisfy all technical questions now, so that certification can be issued promptly after the waiver application is granted.

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Thank you for your attention to this matter. Please let me know if you have any further questions or require any additional information.

Very truly yours,

A handwritten signature in black ink, appearing to read "Aaron M. Panner". The signature is written in a cursive style with a horizontal line at the end.

Aaron M. Panner

cc: Jim Shaffer