

November 13, 2003

Mr. Andy Leimer
Federal Communications Commission
FCC Laboratory Division
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia Maryland 21046

Mr. Leimer,

With regard to your email of October 31, 2003 (correspondence 25894) concerning FCC ID OWDTR-0019-E, under 731 confirmation number EA696957, I am providing explanatory discussion to each of the items you presented. Each numbered item is reproduced in this letter for continuity.

1) Please submit close-up photos and/or drawings of RF exposure info label. Include photo/drawing of RF exposure label for console if applicable.

Response: JPG files of close-up photos have been loaded to the website. Console is not applicable.

2) Reply to crn 25753 indicates "conducted output power" is 51.48 dBm = 141 W. For RF exposure evaluation with 50% usage duty factor this is 70.5 W. MPE estimation uses 48.6 dBm = 72.5 W. 90.205(q) is relevant at equipment authorization time for purposes of RF exposure evaluation and establishing installation and use instructions, which should account for maximum expected device output. Form 731 should list nominal output, but RF exposure should account for 90.205(q) allowed power. Per 90.205(q) if 141 W is authorized "rated output power," operation to 169 W is allowed. Please clarify device output power, and revise RF exposure evaluation and installation and use instructions if needed.

Response: Product rated output is 110 watts. The recently website loaded EMC report shows output measurement of 110 watts. The newly website loaded MPE report uses the measured value (109.9 watts) for distance calculations, along with the 20% adder identified in 90.205(r). The most recent rules have the paragraph as (r). This has been done as you have requested, contrary to direction received from Mr. Kwok Chan on other filings. M/A-COM, Inc. trusts that this will satisfy your requirements, and equipment authorization will be granted in a timely fashion, allowing us to fill orders and meet our customer's needs.

tyco

Electronics

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3) It is noted that "+9dB for 8-element array" is remnant of testlab's standard MPE format and is not applicable to this filing.

Response: The newly loaded MPE report has the format corrected.

4) It is noted that NPRM FCC 03-132 is considering changes in FCC rules to refer to SAR rather than MPE for certain devices. Please note however that FCC does not consider a SAR test setup with antenna, finite counterpoise, and flat phantom near wall and floor ground planes to be representative of actual as-installed exposure conditions. The SAR report is not relevant to this filing.

Response: Please have the SAR report removed from the exhibits.

Sincerely,



Daryl Popowitch
Engineering Project Manager

M/A-COM, Inc. – Lynchburg, VA