



Spotwave Wireless Inc.  
1 Hines Road  
Ottawa ON K2K 3C7  
Canada

Tel: (613) 591-1662  
Fax: (613) 591-8107  
[www.spotwave.com](http://www.spotwave.com)

December 20, 2002

Federal Communications Communication  
7435 Oakland Mills Road  
Columbia, MD  
21046  
USA

Dear Sir/Madam:

During our previous submission for SpotCell 111/112 for the DU, with FCC ID N° P3YSPOTCELL0005, which covers the Uplink frequency band for PCS 1900MHz, we had excluded the last 5MHz of operation, namely 1905MHz to 1910MHz, because the test sample appeared to fail the 3<sup>rd</sup> harmonic inter-modulation product limit for two tone test. We have now confirmed that this failure was due to test methodology rather than the actual hardware or software failure. After further investigation in our lab by our R&D engineers, it is has been verified that we do meet the requirement as set out in 47 CFR, Part 24, subpart E for in-band Inter-modulation products with same hardware and software. We already had the capability to operate in this frequency range during the time of our submission. This can be verified by the fact that the corresponding frequency range on the down-link, 1985MHz to 1990MHz , was covered by FCC ID N° P3YSPOTCELL0006.

Now that this has also been verified by Nemko, (please see attachment) the independent regulatory testing agency that performed the original testing, we are requesting for Class II Permissive change, pursuant to article 23, footnote N°41 of the "Authorization and Use of Software Defined Radios", Document N° FCC 00-430.

Yours truly,

A handwritten signature in black ink, appearing to read "Mike Roper".

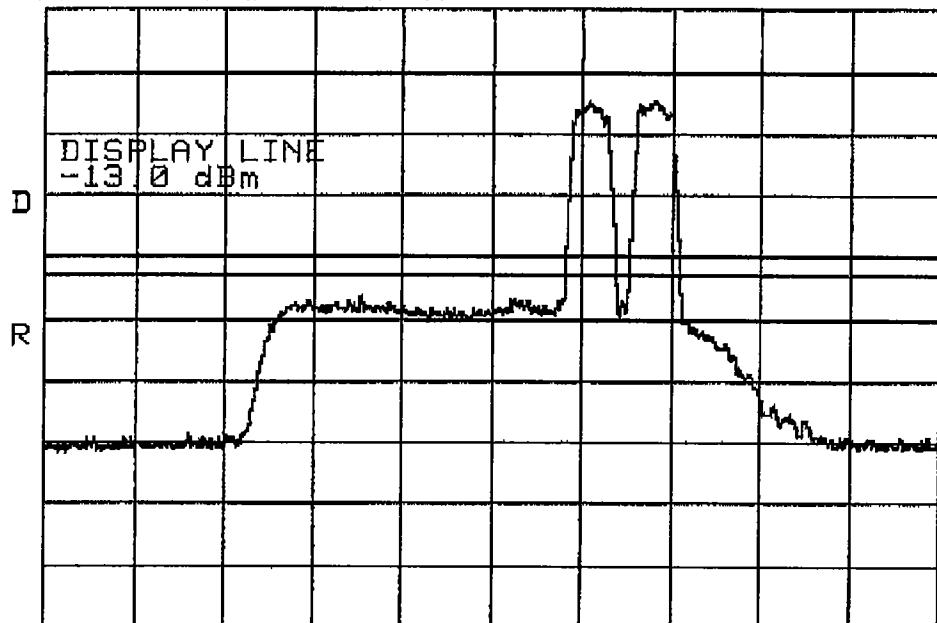
Mike Roper  
Vice President , Product Development

/yb

Encl. 1

ATTEN 40dB  
RL 30.0dBm

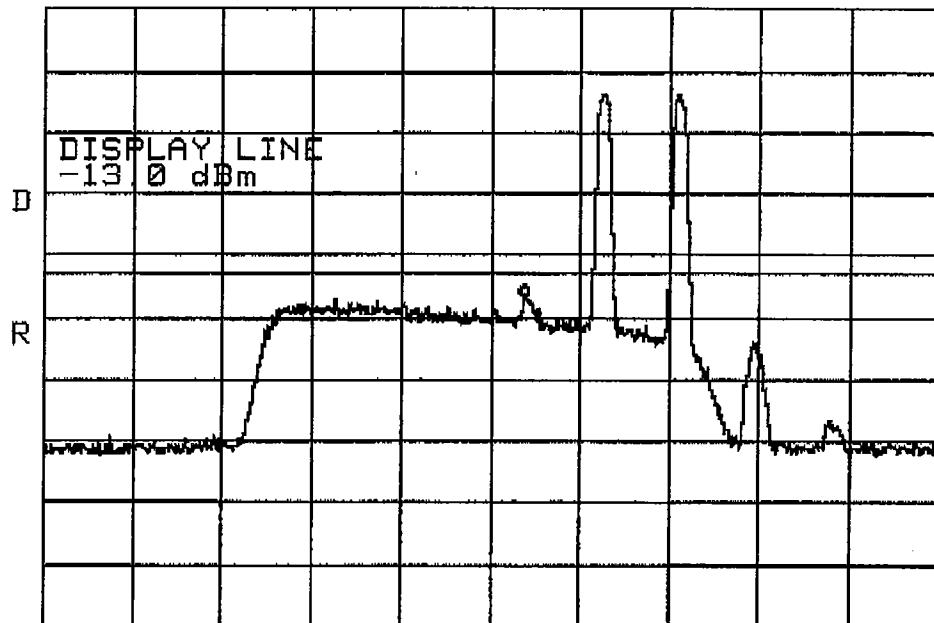
10dB/



DU, Uplink I/M  
High Band, BLK C  
1895-1910MHz  
Input = -30dBm  
CDMA carriers at  
1906.25MHz  
and at 1908.75MHz.

ATTEN 40dB  
RL 30.0dBm

MKR -16.83dBm  
10dB/ 1.90378GHz

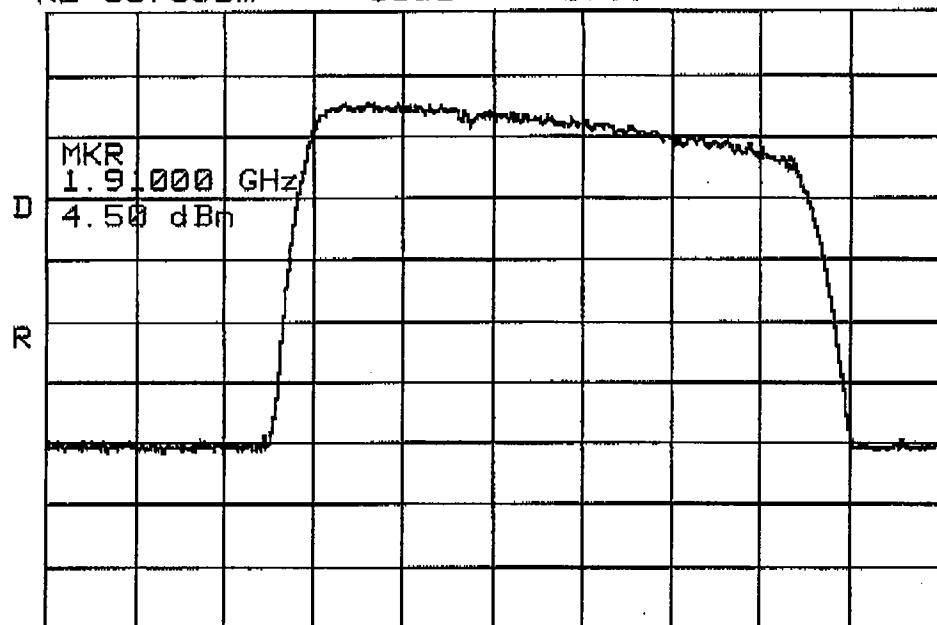


DU, Uplink I/M  
High Band, Blk C  
1895-1910MHz  
Input = -30dBm  
GSM

ATTEN 40dB  
RL 30.0dBm

10dB/  
1.91000GHz

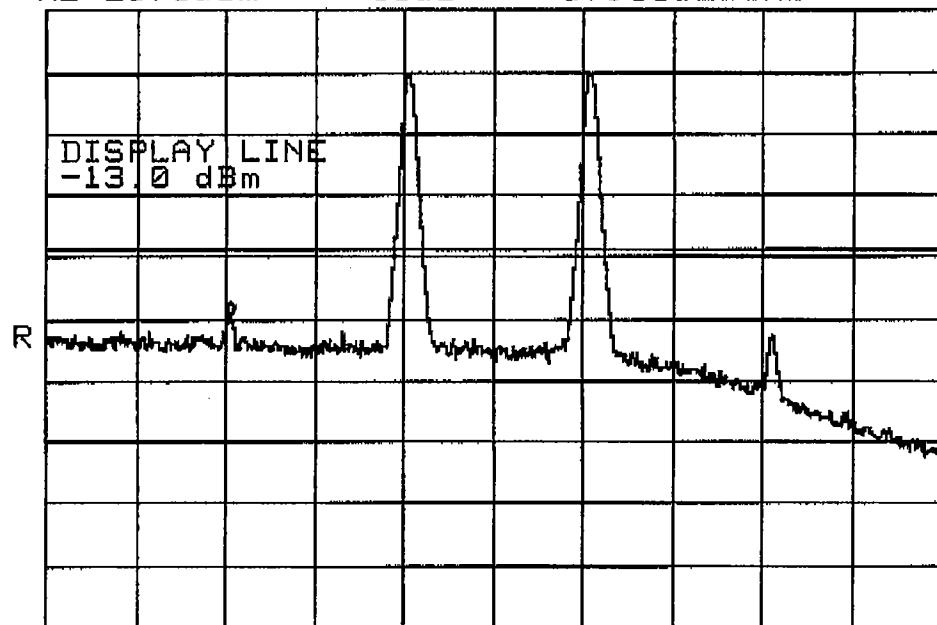
MKR 4.5dBm  
1.91000GHz



START 1.88500GHz STOP 1.91500GHz  
\*RBW 100kHz VBW 100kHz SWP 50.0ms

ATTEN 40dB  
RL 25.5dBm

MKR -23.67dBm  
10dB/ 1.908025GHz



CENTER 1.909500GHz  
RBW 30kHz VBW 30kHz

SPAN 5.000MHz  
SWP 50.0ms