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December 20, 2002

Federal Communications Commission
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 3rd 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 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", is written over a horizontal line.

Mike Roper
Vice President, Product Development

/yb

Encl. 1

ATTEN 40dB

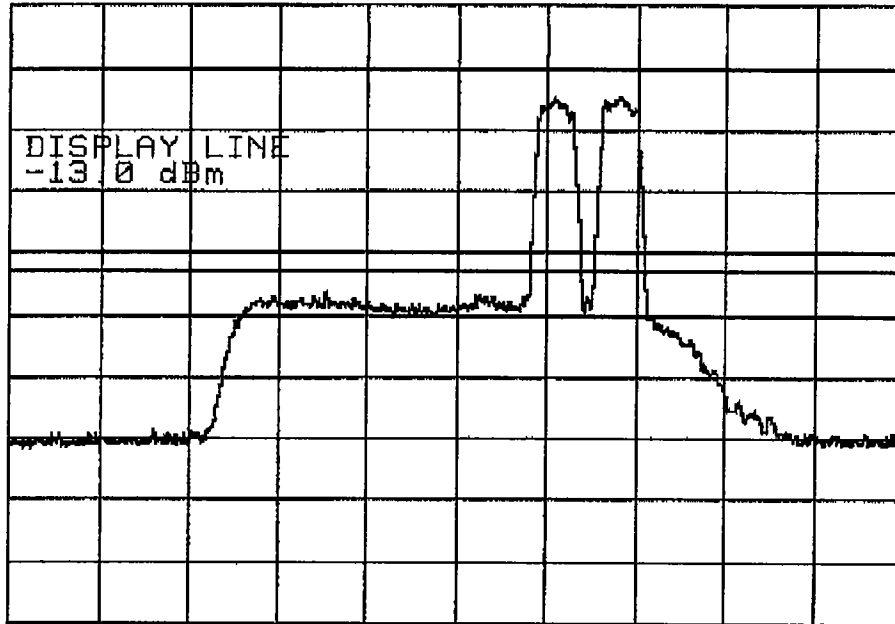
RL 30.0dBm

10dB/

D

DISPLAY LINE
-13.0 dBm

R



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

CENTER 1.90250GHz SPAN 35.00MHz
*RBW 100kHz VBW 100kHz SWP 50.0ms

ATTEN 40dB

MKR -16.83dBm

RL 30.0dBm

10dB/

1.90378GHz

D

R

DISPLAY LINE
-13.0 dBm

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

CENTER 1.90250GHz

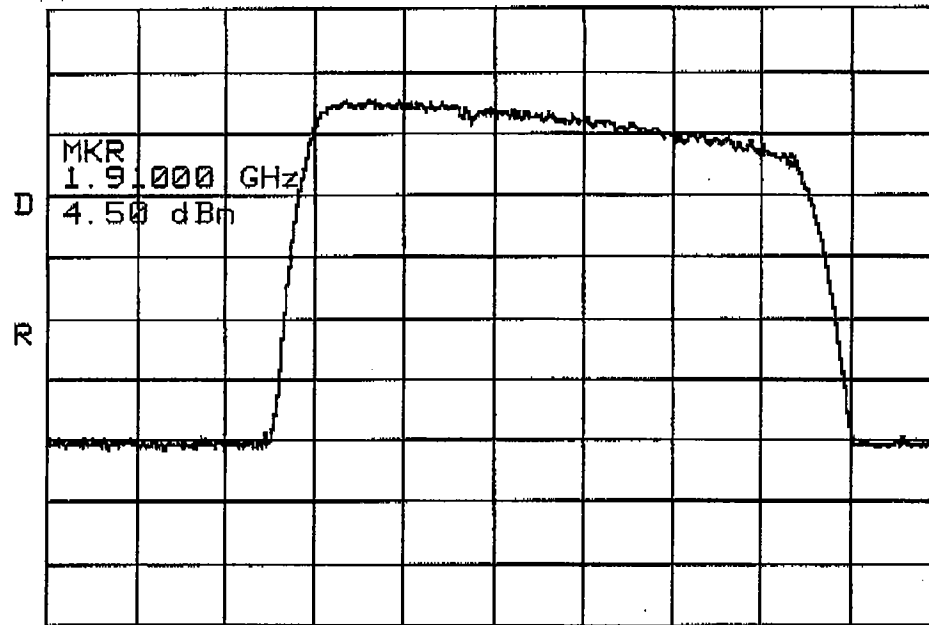
SPAN 35.00MHz

*RBW 100kHz

VBW 100kHz

SWP 50.0ms

ATTEN 40dB MKR 4.50dBm
RL 30.0dBm 10dB/ 1.91000GHz



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

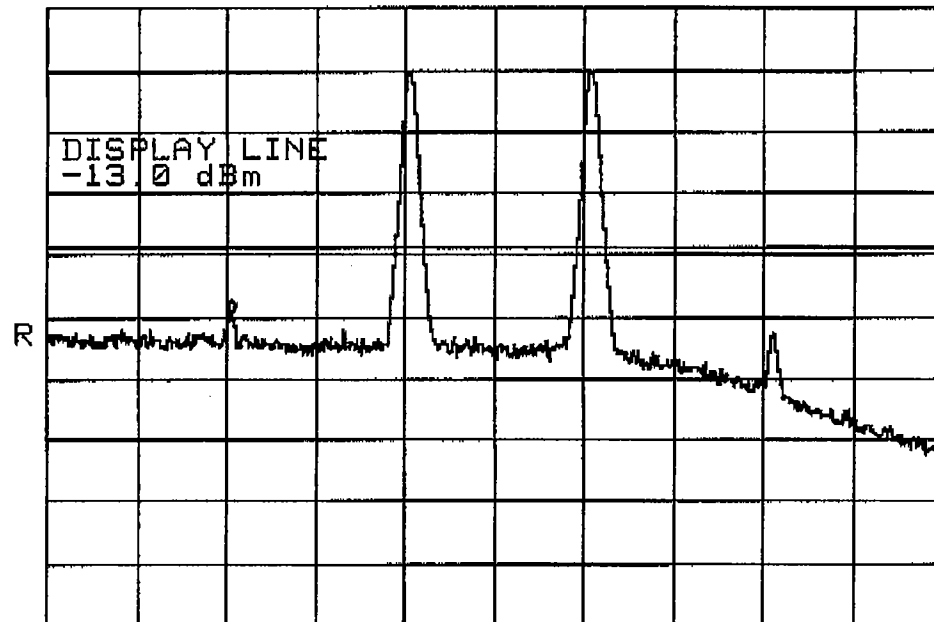
ATTEN 40dB

MKR -23.57dBm

RL 25.5dBm

10dB/

1.908025GHz



CENTER 1.909500GHz

SPAN 5.000MHz

RBW 30kHz

VBW 30kHz

SWP 50.0ms