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November 27, 2000

Authorization and Evaluation Division  
Federal Communications Commission Laboratory  
7435 Oakland Mills Road  
Columbia, MD 21046

RE: Emission Designator for ComSpace Model CDVSL411SAV00  
FCC ID: PCKCDVSL411SAV001

To Whom It May Concern:

Pursuant to 47 CFR 2.201 the Emission Designator for ComSpace Model CDVSL411SAV00, FCC ID PCKCDVSL411SAV001 radio should be: 18K9W7W.

Justification of this choice is as follows:

47 CFR 2.201(a) Necessary Bandwidth: Pursuant to 47 CFR 2.202(c)(4) the Necessary Bandwidth was determined by measuring the signal. The measurement used was the 99% power bandwidth of the signal defined in 47 CFR 90.7 as Authorized Bandwidth. The modulation used in this radio consists of a 16-QAM signal with a symbol rate of 4,000 symbols per second which has a 3dB bandwidth of 4 kHz. These 4 kHz energy bands are offset from the carrier frequency by one of the following: -7.2 kHz, -2.4 kHz, +2.4 kHz or +7.2 kHz. The 99% power bandwidth of this band of energy was measured to be 4.5 kHz. Since Authorized Bandwidth is defined to be centered on the carrier the maximum Authorized Bandwidth for this signal is 2 times 7.2 kHz plus 4.5 kHz which equals 18.9 kHz.

47 CFR 2.201(c) Type of modulation of the main carrier: The modulation used in this radio is Time Division Multiplexed, digital Quadrature Amplitude Modulation with a 16 symbol constellation (TDM 16-QAM). Since this modulation consists of pulses of both amplitude and angle modulation pursuant to 47 CFR 2.20(c)(6) the appropriate designator is 'W'.

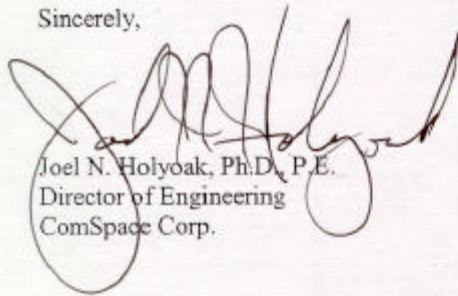


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47 CFR 2.201(d) Nature of signal(s) modulating the main carrier: The modulation consists of four channels where each channel uses digital 16-QAM. Pursuant to 47 CFR 2.201(d)(5) the appropriate designator is '7'.

47 CFR 2.201(e) -- Type of information to be transmitted: The information to be modulated will consist of both speech (telephony) and data. Therefore pursuant to 47 CFR 2.201(e)(8) the designator should be 'W'.

Sincerely,

A handwritten signature in dark ink, appearing to read 'J. Holyoak', with a large, stylized loop at the end.

Joel N. Holyoak, Ph.D., P.E.  
Director of Engineering  
ComSpace Corp.