



RE: FCC ID: POZNPMMDS004699

1. Please note that the documentation does not indicate Instructional Television services use under Part 74 I. The "What is the NPM Base station" section of the theory of operation states the device is for the purpose of "air interface to deliver QoS managed broadband services" and "resource to execute Internet access and telephony applications". Please note that the 731 for this device only mentions Part 21. While the testing appears to show frequencies that are shared with part 74 bands (i.e. 2596–2644MHz), and while channels I21, I29, I22 and I30 are grand fathered, there is nothing evident within the application to show that the device provides "instructional television" services. Therefore the appropriate part would appear to be only part 21. Please explain (provide evidence) as to how this device fits into the Part 74 Subpart I - Instructional Television Fixed Services. Alternately, please clarify if the purpose of providing part 74I data.

Response: Report has been revised to only request approval to part 21K only. All references to Part 74 have been removed.

2. Please note that since the antenna gain of the transmit antenna has not been provided (the only gain given is that of the 38dBi GPS antenna and it is not clear if this is the same gain as the transmit antenna) it is not clear if the ERP of this device actually meets the exclusion from MPE calculations in 1.1307b1. Please provide gain information for the transmit antenna so comparison to 1.1307 can be made for applicability to rf exposure. Alternately, if available, please provide any MPE data for this device showing the device meets the exclusion of rf exposure.

Response: Soma will be using antennas gains ranging from 10 to 19 dBi. An MPE calculation has been uploaded. Also the label that will be placed on the antennas has been uploaded. For purpose of avoiding making multiple labels for each antenna gain, the worst-case distance, which was calculated with the highest gain antenna, has been used in the RF exposure statement. This label will be used and placed on all the other gain antennas visible to all persons that will be expose to the transmitter antenna. Please let us know if this will be ok.

Also, SOMA is aware that the system will have to be evaluated for RF exposure compliance, since the total EIRP is 1683 Watts, which is over the 1640 W (EIRP) threshold. But per FCC, exposure survey, of the base station site, is taken care by the licensee with the FCC Wireless Telecommunication Bureau at the time of license approval.

Regards,

Juan Martinez
Sr. EMC Engineer