

Attn:           Reviewing Engineer

Federal Communications Commission  
7435 Oakland Mills Road  
Columbia, MD 21046

RE: compliance with the requirements in 15.247(a)(1), 15.247(g) and 15.247(h)

To Whom It May Concern:

We, connectBlue AB, aver that our product OEM-Bluetooth module, type number 0005-01, FCC ID: PVH000501 meets the requirements in 15.247(a)(1), 15.247(g), 15.247(h) with the following statements.

**Compliance with 15.247(a)(1)**

The Bluetooth module uses a pseudorandom hopping sequence with 79 channels. Each unit operating as a system member is synchronized to the hopping sequence that is selected by the master unit.

The Bluetooth receiver systems is synchronized to the transmission hopping sequence, thus it is synchronized with the transmissions of system members as they occur. This ensures that the receiver has the best possible signal to noise ratio.

The receiver input bandwidth is 1MHz, thus equal to the bandwidth of the transmitted signal.

**Compliance with 15.247(g)**

The pseudorandom sequence is selected from the system clock of the master unit, and all units within a specific system are synchronized to the same sequence.

Since data transmission is not synchronized to initiate on any specific frequency, the random occurrences of request for such transmission and the indeterminate length of such transmissions insure that, on average, each frequency within a hopping sequence is equally used.

The Bluetooth module has no limitations regarding the length of the data stream presented to it, this also applies to a continuous data stream.

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**Compliance with 15.247(h)**

The pseudorandom sequence is generated in a nine-stage shift register whose 5th and 9th stage outputs are added in a modulo-two addition stage with the result fed back to the input of the first stage. This produces a pseudorandom sequence length of 511 bits.

Inquiry and paging modes are only used to monitor members of the system and to establish the initial connection between communicating units. These functions require only very brief intervals of time usually only a few milliseconds and are randomly selected from 32 channels. After the connection is made, the system goes into a pseudorandom 79 channel hopping sequence for data transmission.

There is absolutely no form for coordination of hopping sequence selection between the master units of different pico-cells.