

## INTRODUCTION

### PINEAPPLE TECHNOLOGY APPLICATION FOR RETROFIT KIT FOR UST-106A WITH RESPECT TO COMPLIANCE FOR PART 74.

Pineapple Technology Inc. (PTI) has designed, built, tested and intends to market a retrofit kit, designated UST106 Pro, to retrofit Television Technology Corp. UST-106A TV translators with external modulator inputs. The kit consists of basically a wideband solid state power amplifier, RF bandpass filter, and power supply. The substitution of the solid state amplifier and power supply to replace existing tube amplifier in the UST-106A is accomplished with the attached modification instructions. The attached exhibit concerning the documentation of the retrofit kit is a preliminary version of the documentation. A final documentation package will be submitted upon its completion from the publisher. Confidentiality is requested for the portion of the documentation package that includes the schematics (including block diagrams) and wiring diagrams. The submission of the following exhibits is expected to demonstrate compliance with applicable Part 74 rules and regulations. As PTI has been in discussion with the FCC with regard to this retrofit kit, attached letter indicating the detailed requirements for filing with the FCC is also attached.

FEDERAL COMMUNICATIONS COMMISSION  
Laboratory Division  
7435 Oakland Mills Road  
Columbia, MD 21046  
July 20, 2001

31010.0

Pineapple Technology, Inc.  
2085 Humphrey Road  
Penryn, CA 95663

Attention: Mr. Robert R. Artigo

Gentlemen:

This is in response to your letter of June 13, 2001, in which you describe a need to modify existing transmitter and translator units approved by the Commission. This need has been described as being based on the lack of availability of replacement parts for the original units and the requirement for the units to be capable of changing the operating frequency due to displacement by DTV assignments.

In particular, you propose to replace the final RF power amplifier portion of certain Television Technology Corporation (TTC) transmitter and translator units that you identify as Models TTCXL1000MU and TTCUST0-106A, respectively. Further, you have proposed to perform all the measurements required to establish compliance with the applicable portions of the FCC Rules in Part 74, noting that the original frequency determining circuits have not been revised.

Since the modification will be made by the licensee to a unit already in the field, the Commission's rules are not clear on who is the responsible party for the modified device and who should apply for, and receive, equipment authorization of these modifications. If the responsible party is the licensee, that would require an application for Certification to be filed for each modified transmitter. This choice is unacceptable. If the responsible party is Pineapple, that would require a completely new filing for these transmitters because all records from the TTC filing have been destroyed by the Commission. This choice also is unacceptable.

Our proposed resolution to this situation is for Pineapple to file an application for Certification of a "replacement amplifier" under the equipment class of AMP. The Grant of Certification for this device will be conditioned to apply the use of your "replacement amplifier" to the specific TTC units identified in your original letter. Please note, however, that you must refer to these units by their original FCC identifiers (FCC IDs), not Model Numbers. Please refer to the enclosed copy of pages of the Radio Equipment List for this purpose. Test data demonstrating compliance with the technical requirements in Part 74 must be submitted along with the documentation specified in Section 2.1033(c) of the Rules. However, no frequency stability test data is required because, as you noted, none of the frequency determining circuitry has been modified.

Please include a copy of this letter in your application for equipment authorization of the "replacement amplifier."

I trust that this solution will allow the upgrade of the units that you desire. However, if you have any additional questions about this matter, please contact Mr. Frank Coperich at the address above or by telephone at 301-362-3023.

Sincerely,

Richard Fabina  
Chief  
Equipment Authorization Branch