



MULTISPECTRAL SOLUTIONS, INC.
A Tradition of Excellence in Innovation

25 August 2004

Federal Communications Commission
7435 Oakland Mills Road
Columbia, MD 21046

Attention: Reviewing Engineer

Re: QCJPALBDG Badge Tag

Dear Sir:

Please note that, due to the physical size of the above referenced device, the requisite wording from Sections 15.19 and 15.517 is included in the User's Manual (page ii).

Furthermore, QCJPALBDG is being submitted as a Class II Permissive Change to FCC ID: QCJPAL650 because of the following reasons:

1. The physical layout and components used in the RF frequency determining circuitry in QCJPALBDG is identical to that in the previously certified QCJPAL650;
2. QCJPALBDG was designed to be worn by personnel, hence the term "Badge Tag". As a consequence, the antenna was redesigned to be a flat microstrip design to permit housing in a credit card type holder. This is the only component within the RF assembly that has been modified; and,
3. MSSSI's UWB technology does not use the antenna as a frequency determining element. That is, we are not impulse exciting the antenna and using its dimensions to determine bandwidth and center frequency. These functions are performed with lumped and microstrip filtering elements prior to the antenna. As a consequence, an antenna change only affects the peak and average emission levels, not the frequency or bandwidth.

Sincerely,

Robert J. Fontana, Ph.D.
President