

December 29th, 2008

To: Federal Communications Commission

Reference: FCC Part 90Z Contention based protocol requirements

We are seeking certification for the TR-WMX 3.5GHz PICO Base Station product for use in the 3650-3700 MHz frequency band under FCC Part 90Z. The TR-WMX 3.5GHz PICO Base Station is a Wi-Max base station unit that is compliant with the 802.16 protocol. The device operates on a strictly time-division duplex system on a single channel at a time. Certification is sought for, and performance data is provided.

As an 802.16 compliant device, the TR-WMX 3.5GHz PICO Base Station implements a "restricted" contention based protocol as defined in FCC 07-99. The device is only capable of avoiding interference with other co-frequency devices using the same protocol. Because of this, operation is limited to the lower 25 MHz portion of the 3650 MHz band when operating under FCC part 90Z rules.

It is expected that this transceiver marketed in the United States will also be used in other markets where the companion client devices are authorized to use frequencies ranging from 3650-3700 MHz. Consequently, this transmitter has been designed to meet FCC requirements for operation in the whole 3650-3700 MHz band with the sole exception of the use of a restricted contention based protocol. Performance data is provided to substantiate FCC compliant operation with a companion client device over the broader 3650-3700 MHz range.

To aid equipment authorization in foreign countries, which accept a United States FCC Grant for Equipment Authorization, yet not jeopardize other users in the United States, it is kindly requested that a note be provided in the Grant that states that this type of equipment is compliant for transmitter operation over the broader 3650-3700 MHz range when used with a compatible client device.

Sincerely,
Bud Patterson
VP of Engineering
Tranzeo Wireless Technologies Inc

