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Radio Frequency Investigation Ltd.
Ewhurst Park,
Basingstoke,
England

For the attention of Nick Cobb

Dear Nick

Re: FCC Audit – Professional Installation Requirement for Gemini Products (FCC ID: QWP58XX-S)

I have provided below the justification for considering the Gemini Products as requiring professional installation, and therefore the use of standard antenna connectors is acceptable under FCC Regulations.

Background

The Gemini product range is available in two versions; the most common is fitted with an integral antenna suitable for the vast majority of deployments. In addition, Orthogon Systems does market a 'connectorised' unit without an integral antenna, where the installer may chose to fit an external antenna from the list approved by the FCC for use with the product. This product is intended for more demanding radio links where higher gain antennas are needed to optimise the link performance. The external antennas allowed are all larger than the integral version and require their own mounting hardware.

Justification

1. Marketing

The Gemini product range is sold exclusively via a network of distributors chosen by and under contract to Orthogon Systems. The distributors sell the product only to Value Added Resellers (VARs) who would perform the installation process.

Orthogon systems does not sell products through any retail chain to the general public, nor does it offer the product for sale by mail order.

In the event that the radio link under consideration did require the use of external higher gain antennas, the VAR would procure these antennas from the Distributor. The list of antennas acceptable to the FCC is contained in the User Manual for the product.

2. Requiring Professional Installation

Orthogon Systems states in the User Manual (Section 5) that only suitably qualified people should undertake the installation of the Gemini Products. As detailed above the product is only sold to Distributors/VAR chains who would hire professional installers.

This would be essential for the connectorised version which would only be used for demanding radio radio links and where a professional and detailed radio survey is essential to ensure that the system will operate as required.

3. Application

The Gemini product is not intended for use by the general public; the application is for industrial/commercial use; a typical example would be to provide inter-site linking of company computer networks by point to point radio.

Yours sincerely



Clem Fisher
RF Development Manager,
Orthogon Systems

26/04/04