
From: Rummel, Jeffrey [mailto:Rummel.Jeffrey@ARENTFOX.COM]
Sent: Friday, October 27, 2006 3:28 PM
To: charvey-tcb@ccsemc.com
Cc: Chris Jensen; pat.bellett@groundprobe.com
Subject: GroundProbe Pty Ltd. - Response to September 30, 2006 E-Mail

Re: FCC ID: S490806SSR02, Assessment No.: AN06T6140, Notice#1

Mr. Harvey:

In response to your e-mail dated September 30, 2006 ("September 30 E-Mail"), to Richard Hodgson of GroundProbe Pty Ltd. ("GroundProbe"), with respect to the above-referenced application ("Application"), the following is respectfully submitted:

1. Attached hereto is a file (SSRXAuthlet - Signed.pdf) containing the signed "Letter of Authorization" provided by GroundProbe authorizing undersigned counsel to submit the instant response, and the attached documents, on behalf of GroundProbe. A hard copy of the Letter of Authorization is forthcoming, and will be submitted to you upon receipt.

2. Also attached hereto is a file (SSRXSupp - signed.pdf) containing the signed "Supplemental Request for Confidentiality" ("Supplemental Request") provided by GroundProbe. As explained in the Supplemental Request, additional materials ("Additional Confidential Documents") are being submitted along with this transmittal in response to your September 30 E-Mail. Accordingly, the Supplemental Request is hereby submitted, pursuant to §0.457(d) (1) (ii) and 0.459 of the Commission's rules, to confirm GroundProbe's prior request for confidentiality with respect to the Original Confidential Documents (i.e., those identified in GroundProbe's original Confidentiality Request dated September 7, 2006) and the Additional Confidential Documents being submitted at this time. A hard copy of the Supplemental Request is forthcoming, and will be submitted to you upon receipt.

3. The following specific responses are provided in response to the September 30 E-Mail:

Item 1 (Internal Photos)

In response to the September 30 E-Mail, as part of the Additional Confidential Documents being submitted at this time, a new electronic file (SSR-X REB Internal Photos.doc), attached hereto containing photos of the SSR-X radar electronics box, is hereby submitted in support of the Application. Confidentiality is being requested with respect to the documents contained therein. This file shall replace the prior photo exhibit previously submitted in support of the Application. The prior photo exhibit remains confidential for the reasons previously stated, and as a result such file/documents should not be made available to the public.

Item 2 (Schematics)

In response to the September 30 E-Mail, as part of the Additional Confidential Documents being submitted at this time, a new electronic file (REB_Schematics_Submission2.pdf), attached hereto containing all schematics and block diagrams relevant to the SSR-X radar electronics box, is hereby submitted in support of the Application. Confidentiality is being

requested with respect to the documents contained therein. This file shall replace the block diagrams previously submitted in support of the Application. The previously-submitted block diagrams remain confidential for the reasons previously stated, and as a result such file/documents should not be made available to the public.

Item 3 (Test Method)

In response to the September 30 E-Mail, the following is respectfully submitted:

GroundProbe understands that the substitution method is the primary method to address radiated spurious emission compliance. However, as set forth at OET Website Publication Number 213318 (copy of Publication attached as part of file named "ANSI.pdf"), testing pursuant to ANSI C64.3 is permitted when "the initial measured field strength levels of the spurious emissions are more than 20 dB below" the 3 meter field strength limits equivalent to the EIRP limit. This issue was confirmed with CCS' Mike Kuo during the initial certification of the SSR system (see attached e-mail from Mike Kuo dated 5/12/2005 as part of file named ANSI.pdf). Further, we note that the use of the ANSI C63.4 test plan (in connection with the original certification of the SSR system last year) was also confirmed by CCS' Mike Heckrotte and the FCC's Steve Dayhoff at the commencement of the certification process. Because in this case the initial measured field strength levels of the spurious emissions were more than 20 dB below the 3 meter field strength limits equivalent to the EIRP limit, ANSI C63.4 was used in place of EIA/TIA 603B. This issue was generally referenced at the top of Page 13 of EMI Test Report dated 7/24/06. If any supplemental statements are necessary to confirm this issue, GroundProbe would be pleased to provide same. GroundProbe understands that the documents submitted in the attached file named ANSI.pdf are not subject to confidentiality.

Item 4 (Test Report Photos)

In response to the September 30 E-Mail, attached is a single bundled file (M060755_Cert_Tx EMC Technologies SSR-X Test Report Photos.pdf) containing the 5 photos shown in the EMC test report. GroundProbe understands that these documents are not subject to confidentiality.

Item 5 (Bandwidth/ Emissions Designator)

In response to the September 30 E-Mail, the following is respectfully submitted:

With respect to the determination of Necessary Bandwidth, the "96M5" was derived from the measured occupied bandwidth of the Radar as shown in the EMC Technologies EMI Test Report. With respect to the identification of the "P0N" emissions designator, it was determined that the SSR is characterized as P0N, as the radar carrier is not modulated by a modulating input signal channel.

- With regard to the first symbol (type of modulation of the main carrier), the letter "P" was chosen. "P" represents a "sequence of unmodulated pulses". In this regard, the SSR-X system transmits a sequence of pulses which are unmodulated as the device uses no channelization.

- With regard to the second symbol (nature of signal(s) modulating the main carrier), "0" was chosen. "0" represents "No modulating signal". In this regard, the SSR-X system transmits no information which changes with time. The SSR-X has no input modulation channel, so the radar effectively has no modulating signal.

- With respect to the third symbol (type of information to be transmitted), "N" was chosen. "N" represents "No information transmitted". In this regard, the SSR-X system is a radar, and no information is transmitted from the SSR-X Radar Electronics. (Other categories in 47 CFR 2.201(e) all refer to some type of information bearing telecommunications device.)

GroundProbe understands that the above explanation is not subject to confidentiality.

Item 6 (Tune-Up Procedure)

In response to the September 30 e-mail, as part of the Additional Confidential Documents being submitted at this time, a new electronic file (Tune Up Procedure.pdf), attached, is hereby submitted in support of the Application. Confidentiality is being requested with respect to that document.

Item 7 (Radio Link Modem)

In response to the September 30 e-mail, the following is respectfully submitted:

- The FCC ID for the Elpro 905U-D radio link modem is: O9P ELPSS0D (Grantee Code: O9P; Product Code: ELPSS0D). This equipment is approved for use with 2dBi half wave dipole antenna.

- The version of the SSR-X Operator Manual originally submitted to CCS in support of the Application was incorrect. Accordingly, as part of the Additional Confidential Documents being submitted at this time, a new electronic "zip" file (SSR-X_Operator Manual.zip) containing the correct version of the SSR-X Operator Manual is attached, and confidentiality is being requested with respect to the documents contained therein. This correct version of the Operator Manual shall replace the prior incorrect version of the Operator Manual previously submitted in support of the Application. The prior version of the Operator Manual remains confidential for the reasons previously stated, and as a result such file/documents should not be made available to the public.

- The antenna shown in the attached revised equipment operator manual is a 2dBi half wave dipole antenna supplied by Elpro (Elpro p/n CFD 890 EL).

Should any questions arise with respect to this submission, please do not hesitate to contact undersigned counsel.

Respectfully submitted,

Jeffrey Rummel
Attorney for GroundProbe Pty Ltd.

Jeffrey E. Rummel, Esq.
Arent Fox PLLC
1050 Connecticut Avenue, NW
Washington, DC 20036-5339
Tel: 202-715-8479
Fax: 202-857-6395
rummelj@arentfox.com
www.arentfox.com

CONFIDENTIALITY NOTICE: This e-mail and any attachments are for the exclusive and confidential use of the intended recipient. If you received this in error, please do not read, distribute, or take action in reliance upon this message. Instead, please notify us immediately by return email and promptly delete this message and its attachments from your computer system. We do not waive attorney-client or work product privilege by the transmission of this message.

IRS Circular 230 disclosure:

To ensure compliance with requirements imposed by the IRS, we inform you that, unless expressly stated otherwise, any U.S. federal tax advice contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction or matter addressed herein.

-----Original Message-----

From: charvey-tcb@ccsemc.com [mailto:charvey-tcb@ccsemc.com]
Sent: Friday, September 29, 2006 4:15 PM
To: richard.hodgson@groundprobe.com
Cc: charvey-tcb@ccsemc.com; claire.hoque@ccsemc.com
Subject: GroundProbe Pty Ltd, FCC ID: S490806SSR02, Assessment NO.: AN06T6140, Notice#1

Richard,

I have performed the initial review of the above referenced TCB application and find that the following items need to be addressed before the review can be completed:

1. The internal photographs which are included in the confidentiality request do not show the required detail per FCC 2.1033. Please submit an updated photo exhibit that shows both sides of all PC Boards and under the RF Shields.
2. The exhibit labeled as Schematic is actually a Block Diagram. Please submit a replacement exhibit that contains the schematic diagram for this device.
3. The test report lists ANSI C63.4:2003 as the test procedure, which is actually the test procedure for Pt. 15 devices. Licensed devices are required to have tests performed in accordance with EIA/TIA 603B. Please verify that the tests were performed using the correct procedure and then update the test report accordingly.
4. Please extract the test setup photos from the test report to create a separate exhibit.
5. Please provide a justification/explanation for using the Emission Designator 96M5P0N per the guidance of FCC 2.201.
6. Please provide a tune-up procedure exhibit in accordance with FCC 2.1033 (this exhibit is already listed on the confidentiality letter but the exhibit was not submitted for review).

7. Your Users Manual indicates that Spread Spectrum 915-928MHz Radio Link radios are used with this device to send data packets. The FCC Id number of that transmitter has not been provided. Please provide that FCC ID number and verify that the antennas listed in the Radio Link Installation manual have been approved for use with that transmitter.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 30 days of the original e-mail date may result in application dismissal and forfeiture of the filing fee. Also, please note that partial responses increase processing time and should not be submitted. Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.

Best regards,

Chris Harvey
charvey-tcb@ccsemc.com