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August 3, 2005

Intertek Testing Services NA, Inc.
1365 Adams Court,
Menlo Park, CA
USA 94025

Re: Request for Limited Modular approval of Transceiver FCC ID: S52P1900-1

We request that the iCell Pico BTS Shelf transceiver module be approved as a modular unit, and the unit has the following features which meet the FCC requirement as outlined in its public notice PN27 Aug02.

The unit meets the standalone requirements of a module per the following:

(1) The unit has its own RF shielding such that the module does not have to rely upon the shielding provided by the device into which it is installed.

(2) It has buffered data inputs - Ethernet RJ45 input.

(3) The module has its own power supply regulation.

(4) Antenna – The module is not sold with antenna. See note below.

(5) The module is to be tested in a stand-alone configuration. The only connections required are: DC power, Ethernet RJ45 for control. The antenna is not normally sold with the unit.

(6) The nodule will be labeled with its own FCC ID number, and, if the FCC ID is not visible when the module is installed inside another device, then the outside of the device into which the module is installed will display "Contains FCC ID:S52P1900-1"

It will operate in Band Class 1, licensed 1900MHz PCS Band.

Furthermore, UTSI has no plans to sell the module to an OEM. In other words, UTSI will control the mounting and installation of the module into either a plastic enclosure for wall mounting or into a metal chassis for rack mounting. UTSI will control the installation process such that compliance of the end product is assured.

The unit is not normally sold with antennas. Licensed 1900MHz PCS band operators will be responsible for selection of active or passive antennas and ensuring proper installation in commercial buildings.

Sincerely,

Richard LaLau, P.Eng.
Director, Base Station Development
UTStarcom Canada
604.303.2331