

Andrzej Skoskiewicz

From: Anne E. Linton [alinton@alumni.princeton.edu]
Sent: Wednesday, January 18, 2006 6:14 AM
To: tdwyer@us.tuv.com
Cc: Andrzej Skoskiewicz; Stewart Cobb
Subject: FW: Novariant Inc. equipment authorization issues - with rule section corrected
Importance: High

Dear Mr. Dwyer,

Andrzej Skoskiewicz of Novariant asked me to assist in getting some information from the FCC related to Novariant's equipment authorization process. As I understand matters, you had questions about several rule sections in Part 90.

We took those questions to the FCC. We went to the Wireless Bureau and to the OET Lab in Columbia. The Bureau's Tim Maguire deferred to the lab on the questions.

This morning, Stan Lyles of OET sent the message that I am forwarding to you. He answers the pending questions. Please take a look at this message and let us know if you have any additional questions. As I am sure you know, this issue is somewhat time sensitive for Novariant, so anything you can do to help wrap this matter up would be most appreciated.

Thank you very much for your help. If there is anything else you need, please let us know.

Best regards,

Anne Linton
For Novariant, Inc.

Anne E. Linton, Esq.
Washington Federal Strategies
4601 North Park Avenue, Suite 710
Chevy Chase, Maryland 20815
(301) 951-7062
alinton@alumni.princeton.edu
www.wfsllc.biz

From: Stanley Lyles [mailto:Stanley.Lyles@fcc.gov]
Sent: Wednesday, January 18, 2006 8:29 AM
To: alinton@alumni.princeton.edu
Cc: Joe Dichoso; Tim Maguire; Steven Dayhoff; Stanley Lyles
Subject: RE: Novariant Inc. equipment authorization issues - with rule section corrected

Hello Anne,

Below are comments in **BOLD** about equipment authorization. Please submit this e-mail to the FCC filing.

Stan Lyles
FCC/OET/EAB

*** Non-Public: For Internal Use Only ***

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

From: Anne E. Linton [mailto:alinton@alumni.princeton.edu]
Sent: Friday, January 13, 2006 3:34 PM
To: Stanley Lyles; Tim Maguire
Cc: 'Stewart Cobb'; 'Andrzej Skoskiewicz'; Anne E. Linton
Subject: FW: Novariant Inc. equipment authorization issues - with rule section corrected
Importance: High

Dear Mr. Lyles and Mr. Maguire,

Dr. Cobb reviewed the previous message and noted that I made a typographical error in a rule section earlier, I put in a 5 where I should have used a 9.

Please read this version instead, and please accept my apology for the earlier error.

Best regards,

Anne

From: Anne E. Linton [mailto:alinton@alumni.princeton.edu]
Sent: Friday, January 13, 2006 2:34 PM
To: tim.maguire@fcc.gov; stanley.lyles@fcc.gov
Cc: 'Stewart Cobb'; 'Andrzej Skoskiewicz'; Anne E. Linton
Subject: Novariant Inc. equipment authorization issues
Importance: High

Dear Mr. Maguire and Mr. Lyles,

I spoke with Mr. Maguire this morning who suggested that I write with some information on where we are in this process. Then, hopefully, you can help us to complete the equipment authorization.

In April 2005, we met with the FCC. At a meeting at OET's lab in Columbia on the afternoon of April 22, 2005, we met and discussed the Novariant radiolocation system and some of the applicable regulations that would affect the equipment authorization process.

The equipment is being evaluated by a test lab, TUV. The process is being supervised at TUV by Mr. Tim Dwyer.

The radiolocation system uses an extremely wideband transmission of data in the radiolocation service. It is digital in nature and not channelized. The signal is a

pulsed, digital, data/telemetry signal, with an emission designator G1D. The transmission occupies most of the bandwidth for which the system is licensed. To help anticipate possible questions, I am attaching a reference copy of a license that Novariant has received from the FCC for use of its own product. The call sign is: WQDS541 - Novariant, Inc.

In meeting with the FCC in April 2005, we discussed the applicable emission mask for a radio system that operates in the 9500 to 10000 band using very wideband transmissions. Based upon the provisions of section 90.210(m) of the Commission's rules, we were told that the appropriate emission mask to use for this system is mask B. TUV is asking that the Commission confirm this. What do we need to do to help you confirm this for TUV?

Answer:

Yes, Mask B is applicable in this case.

Also, TUV asked about the Commission's views of the channel spacing requirements of section 209(b)(5). The regulation has no requirement for specific channel spacing for transmissions in the 9500 to 10000 MHz range, which is the spectrum this system is licensed to use. The license specifies the authorized bandwidth. It is not a channelized transmission, but it does pretty much fill the bandwidth for which the system is licensed. Can you confirm for TUV that 90.209(b)(5) does not specify channelization for transmissions in the 9500 to 10000 range?

Answer:

In this case, since the frequency is above 2500 MHz, the channel size is determined by the license. Section 90.209(b)(5) does not specify channel size above 2500 MHz.

Finally, TUV asked about the provisions of 90.205(p) with regard to power levels. The service rules in Part 90, subpart F do not have a power limitation, instead, power limitations are addressed in the license application. When we met with OET in April, we were advised that the equipment would need to meet the specifications defined by the company, and those specifications needed to be within the parameters of any license the Commission would grant. Beyond those parameters, we are seeking to confirm with you for TUV that the equipment is in compliance with the regulations.

Answer:

The RF power limit is determined by the license in this case. The maximum power requested in the license should not be exceeded in operation.

If you need additional technical data, I can arrange for Novariant's engineers to supply additional information. The company is in the fortunate position of having interested customers, so we are eager to complete the equipment authorization process as soon as possible.

I am available at 301-951-7062 or alinton@wfsllc.biz if you have any questions. TUV tells us they would be satisfied with an e-mail from the FCC on these points, if that is possible. Novariant's engineer, Stewart Cobb, may write to follow with additional details on some of these points, if I have left out anything essential.

Thank you very much for your help on this matter.

Best regards,

Anne

Anne E. Linton, Esq.
Washington Federal Strategies
4601 North Park Avenue, Suite 710
Chevy Chase, Maryland 20815
(301) 951-7062
alinton@alumni.princeton.edu
www.wfsllc.biz
