Correspondence Reference #37301

Federal Communication Commission
Equipment Authorization Division,
Application Processing Branch
7435 Oakland Mills Road
Columbia, MD 21048

April 16, 2009

Dear Ms. Poll,

Pursuant to Paragraph §15.247 (a)(1)(iii) of 47 C.F.R "the average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by the number of hopping channels employed."

We are using 79 channels i.e. the average time of occupancy on any channel shall not be greater than 0.4 seconds within a period of 0.4 seconds multiplied by 79 channels (0.4 x 79 = 31.6 seconds), i.e. within a period of 31.6 seconds.

Hopping rate is 1600 times per second, hence the time slot width is equal to 1/1600 = 625us.

Therefore, the average time of occupancy (dwell time) = 1 time slot length (625us) x hopping rate (1600 per second) / number of hopping channels (79) x 31.6 seconds = 0.4 s.

The example on page 14 shows that regardless the data packet type/length (DH1 or DH5) the average time of occupancy on any hopping channel is not greater than 0.4 seconds, which is in compliance with Paragraph §15.247 (a)(1)(iii).

Should you need further information please don't hesitate to contact us,

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