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15 March 2001

Authorization and Evaluation Division  
Federal Communications Commission Laboratory  
7435 Oakland Mills Road  
Columbia, MD 21046

RE: Emission Designator for ComSpace Model CDRTL841FL001  
FCC ID: PCKCDRTL841FL0011

To Whom It May Concern:

Pursuant to 47 CFR 2.201 the Emission Designator for ComSpace Model CDRTL841FL001, FCC ID PCKCDRTL841FL0011 radio should be: 18K4D7W.

Justification of this choice is as follows:

47 CFR 2.201(a) Necessary Bandwidth: Pursuant to 47 CFR 2.202(c)(4) the Necessary Bandwidth was determined by measuring the signal. The measurement used was the 99% power bandwidth of the signal defined in 47 CFR 90.7 as Authorized Bandwidth.. This measurement indicated that 99% of the power is contained within a bandwidth of 18.4 KHz centered on the carrier (assigned) frequency.

47 CFR 2.201(c) Type of modulation of the main carrier: The modulation used in this radio is digital Quadrature Amplitude Modulation with a 16 symbol constellation (16-QAM). Since this modulation consists of both amplitude and angle modulation pursuant to 47 CFR 2.20(c)(4) the appropriate designator is 'D'.

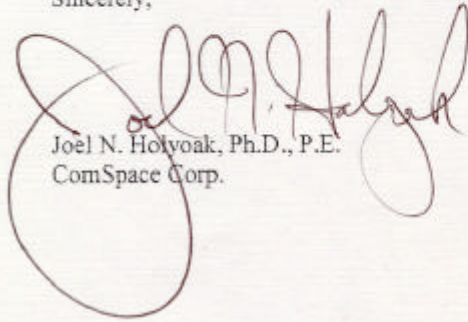
47 CFR 2.201(d) Nature of signal(s) modulating the main carrier: The modulation consists of four channels where each channel uses digital 16-QAM. Pursuant to 47 CFR 2.201(d)(5) the appropriate designator is '7'.



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47 CFR 2.201(e) -- Type of information to be transmitted: The information to be modulated will consist of both speech (telephony) and data. Therefore pursuant to 47 CFR 2.201(e)(8) the designator should be 'W'.

Sincerely,

A handwritten signature in dark ink, appearing to read "Joel N. Holyoak". The signature is stylized with large loops and a long horizontal stroke at the end.

Joel N. Holyoak, Ph.D., P.E.  
ComSpace Corp.