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December 9, 1999

Reviewing Engineer
Application Processing Branch
FEDERAL COMMUNICATIONS COMMISSION
7435 Oakland Mills Road
Columbia, Maryland 21046

Subject: CLASS II PERMISIVE CHANGE FOR SCANNING RECEIVER TO DEMONSTRATE COMPLIANCE TO FCC PART 15.121

FCC ID: AMWUB304

Dear Sir or Madam:

Pursuant to a letter from Mr. Richard Fabina dated October 8, 1999, this letter and accompanying documentation represents our application for a Class II Permission Change for the above referenced device. Basically, the purpose of this submission is to provide a record of compliance to the new rules for scanning receivers, which were not in effect at the time the referenced device was first submitted for equipment authorization and the subsequent grant issued by the Commission.

Please note that no changes to the device have been made since the original application except for a change in wording that appears on the label. The new requirements in FCC Part 15.121(f)(1) mandate certain verbiage which was not required when the device was first granted. An exhibit, which shows the new label, is being provided for your reference.

Within the aforementioned letter from Mr. Fabina, he requested "a statement that assesses the vulnerability of the scanning receiver to possible modifications and describes the design features that prevent modification of the scanning receiver to receive Cellular transmissions". He also requested "a statement that describes the design steps taken to make tuning, control and filtering circuitry inaccessible".

In reply to both of the above requests, Uniden initially designed the circuitry so that the inventory of tunable frequencies of the device exclude the bands of frequencies assigned to the Cellular Radiotelephone Service. Furthermore, the receiver was designed to provide a minimum 38 decibel image frequency rejection ratio across the tunable range of the device so that cellular transmissions could not be intercepted and overheard on any other tunable frequency of the scanning receiver.

Additionally, the circuitry associated with the tuning, control, and filtering components, which might be modified in order to defeat the designs that inhibit cellular reception, were hardened using a non-transparent epoxy that contained fiberglass particles. These hardening procedures have been demonstrated at the FCC Lab and were found to be an acceptable deterrent against possible modifications that attempt to defeat the provisions mandated in FCC Part 15.121.

The test procedures and results of the 38 decibel image frequency rejection ratio are being provided with this submission. The accompanying documentation describes the test setup, the test procedures, and the test results. These results clearly demonstrate that the 38 decibel requirements for image rejection have been met.

Thank you for your consideration in this matter. We trust that the above details and the referenced exhibits will satisfy the requirements for this submission. Please contact me if you have any further questions or require any additional information.

Regards,

James R. Haynes
Vice President, Engineering and Regulatory Affairs