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TAIYO MUSEN CO., LTD.

April 5, 2000

Mr. Joe Dichoso
Application Processing Branch
FEDERAL COMMUNICATIONS COMMISSION
7435 Oakland Mills Road
Columbia, Maryland 21046

Subject: P-ROM

Correspondence Reference Number: 11339
731 Confirmation Number: EA95685
FCC ID: BAA9JKTD-L1620A

Dear Mr. Dichoso,

Regarding the programming of the P-ROM, the P-ROM we use for TD-L1620A is for only one time use and it is not possible to rewrite on the original program. That is, when we change the program of P-ROM, we either prepare new P-ROM /or initialize the used P-ROM completely and then, install the new program. We believe that we comply with the intent of Section 15.121. Any attempt to modify the program to operate with other than the intended code would realistically be likely render the receiver inoperable because you would have to initialize the P-ROM and destroy factory code in first step of a reprogramming attempt. To gain access to the P-ROM the TD-L1620A would have to be physically disassembled, requiring hand tools to do so. We do not consider the internal location as accessible to the end user.

The program in P-ROM is made by machine language (old style of programming) and the program construction is proprietary, that is, TAIYO original way of programming. For this reason, we can't divulge certain details concerning the program in the P-ROM. In the case of re-programming the construction of the P-ROM outside of our factory to receive cellular frequencies, we believe it is not possible to simply withdraw the data from our P-ROM and then, changing some parts of the program and have the TD-L1620A able to receive in the cellular band. A great deal of technical knowledge and some special equipment not available to most end users, would be needed to even attempt such an act.

In addition to proprietary program construction on P-ROM, TD-L1620A receiver hardware does not have ability to receive outside of frequency range from 110- 170 MHz. This is because the antenna of TD-L1620A will be beyond its ability if this model try to receive outside the 110-1170 MHz frequency range and the exclusive PCBs in TD-L1620A can not work properly on frequencies out of the specification for this model .

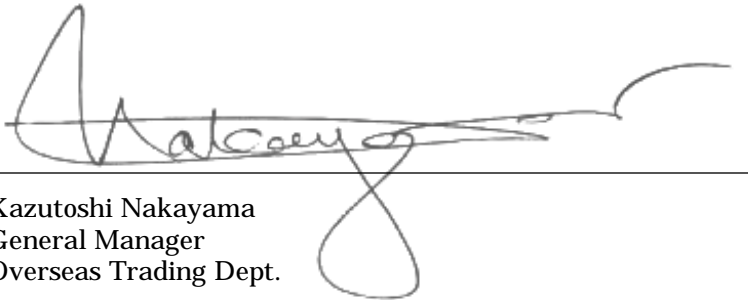
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Even if a highly skilled person with the required technical hardware was able to decipher the program construction of the P-ROM for a TD-L1620A and successfully copy and re-program the contents of the P-ROM to use on the TD-L1620A. It is still not possible to receive signals in the cellular band.

We appreciate the your understanding that the TD-L1620A itself is developed and manufactured based on the concept for use in direction finding and receiving function and the DF antenna is focused on the specific frequency range, 110 - 170 MHz.

Best regards

A handwritten signature in dark ink, appearing to read 'Kazutoshi Nakayama', is written over a horizontal line. The signature is stylized with a large initial 'K' and a long, sweeping underline that loops back under the name.

Kazutoshi Nakayama
General Manager
Overseas Trading Dept.