

August 25, 2004

Mr. Tim Harrington  
Federal Communications Commission  
FCC Laboratory Division  
Equipment Authorization Branch  
7435 Oakland Mills Road  
Columbia, Maryland 21046

Ref.: CRN 13125  
FCC ID: BV8MBS700A100  
731 Confirmation Number: TC827699

Mr. Harrington,

With regard to the communication of July 28, 2004 concerning an audit of the referenced FCC ID number, M/A-COM, Inc. believes the Grant of Equipment Authorization notes are adequate and sufficient for this base station filing.

Environmental Assessment (EA) is not necessary under the requirements of §1.1307(a). §1.1307(b) identifies those categories for routine environmental evaluation and EA preparation. If not listed in Table 1 of this section, then there is a categorical exemption. Although Private Land Mobile Radio is identified as a service, for both building and non-building mounted antennas the power level of 1,000 watts provides the exclusion as the M/A-COM, Inc. filing is for a 100 watt device (maximum).

§1.1307(a)(1) further specifies paragraphs (c) through (e) and they would not apply as the device has not been deployed and remaining system elements are in development.

Each base station site implementation may be unique in terms of antenna type, antenna directionality, antenna gain, transmission line losses, co location effects, etc. and these elements are picked at the time of site commissioning. To include MPE EA in the Equipment Authorization Grant notes, is not possible due to site equipment variability. There may be instances where existing infrastructure equipment is to be reused. Other manufactures may do so, if they have a single antenna, etc. but this is not the case for M/A-COM, Inc.

TCB training notes of May 2003 indicates that base station site licensing is the appropriate point for EA of a base station and site.

M/A-COM, Inc. has taken this approach through the years and believes it should be applied for this base station Equipment Authorization Grant as well.

M/A-COM, Inc. requests the Commission reconsider the findings of the audit and dismiss any further, allowing the Equipment Authorization Grant to remain in effect.

Sincerely,

A handwritten signature in black ink that reads "Daryl G. Popowitch". The signature is written in a cursive style with a large, stylized 'D' and 'P'.

Daryl Popowitch

Regulatory Manager  
Engineering Project Manager

M/A-COM, Inc. – Lynchburg, VA