



M. Flom Associates, Inc.

International Compliance Testing Laboratory

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info@mflom.com

Date: February 19, 2005

Federal Communications Commission
Via: Electronic Filing

Attention: Authorization & Evaluation Division

Applicant: Comtek Communications Technology, Inc.
Equipment: BST-75
FCC ID: C6ZBST75
FCC Rules: 2, 90, Confidentiality

Gentlemen:

On behalf of the Applicant, enclosed please find Application Form 731, Engineering Test Report and all pertinent documentation, the whole for approval of the referenced equipment as shown.

Filing fees are attached.

We trust the same is in order. Should you need any further information, kindly contact the writer who is authorized to act as agent.

Sincerely yours,

David E. Lee, Compliance Test Manager

enclosure(s)
cc: Applicant
DEL/del

M. Flom Associates, Inc.
3356 N. San Marcos Place, Suite 107
Chandler, Arizona 85225-7176
(480) 926-3100 phone, fax (480) 926-3598

FCC ID: C6ZBST75
MFA p0520003, d0520041



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Transmitter Certification

of

Model: BST-75
FCC ID: C6ZBST75

to

Federal Communications Commission

Rule Part(s) 2, 90 and Confidentiality

Date of report: February 19, 2005

On the Behalf of the Applicant:

Comtek Communications Technology, Inc.

At the Request of:

Comtek Communications Technology, Inc.
357 W. 2700 South
Salt Lake City, UTAH 84115

Attention of:

Ralph Belgique, President
(801) 446-3463, FAX: 484-6906
(800) 496-3463
ralph@comtek.com

Supervised by:

David E. Lee, Compliance Test Manager

List of Exhibits

(FCC **Certification** (Transmitters) - Revised 9/28/98)

Applicant: Comtek Communications Technology, Inc.

FCC ID: C6ZBST75

By Applicant:

1. Letter of Authorization
2. Confidentiality Request: 0.457 And 0.459
3. Part 90.203(e) & (g) Attestation
4. Identification Drawings, 2.1033(c)(11)
 - Label
 - Location of Label
 - Compliance Statement
 - Location of Compliance Statement
5. Photographs, 2.1033(c)(12)
6. Documentation: 2.1033(c)
 - (3) User Manual
 - (9) Tune Up Info
 - (10) Schematic Diagram
 - (10) Circuit Description
 - Block Diagram
 - Parts List
 - Active Devices
7. MPE/SAR Report

By M.F.A. Inc.:

- A. Testimonial & Statement of Certification

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Required information per ISO/IEC Guide 25-1990, paragraph 13.2:

a) **Test Report**

b) Laboratory: M. Flom Associates, Inc.
(FCC: 31040/SIT) 3356 N. San Marcos Place, Suite 107
(Canada: IC 2044) Chandler, AZ 85225

c) Report Number: d0520041

d) Client: Comtek Communications Technology, Inc.
357 W. 2700 South
Salt Lake City, UTAH 84115

e) Identification: BST-75
FCC ID: C6ZBST75
EUT Description: Transmitter

f) EUT Condition: Not required unless specified in individual tests.

g) Report Date: February 19, 2005
EUT Received: February 14, 2005

h, j, k): As indicated in individual tests.

i) Sampling method: No sampling procedure used.

l) Uncertainty: In accordance with MFA internal quality manual.

m) Supervised by:



David E. Lee, Compliance Test Manager

n) Results: The results presented in this report relate only to the item tested.

o) Reproduction: This report must not be reproduced, except in full, without written permission from this laboratory.

Sub-part

2.1033(c)(14):

Test and Measurement Data

All tests and measurement data shown were performed in accordance with FCC Rules and Regulations, Volume II; Part 2, Sub-part J, Sections 2.947, 2.1033(c), 2.1041, 2.1046, 2.1047, 2.1079, 2.1051, 2.1053, 2.1055, 2.1057 and the following individual Parts:

- ☐ 21 - Domestic Public Fixed Radio Services
- ☐ 22 - Public Mobile Services
- ☐ 22 Subpart H - Cellular Radiotelephone Service
- ☐ 22.901(d) - Alternative technologies and auxiliary services
- ☐ 23 - International Fixed Public Radiocommunication services
- ☐ 24 - Personal Communications Services
- ☐ 74 Subpart H - Low Power Auxiliary Stations
- ☐ 80 - Stations in the Maritime Services
- ☐ 80 Subpart E - General Technical Standards
- ☐ 80 Subpart F - Equipment Authorization for Compulsory Ships
- ☐ 80 Subpart K - Private Coast Stations and Marine Utility Stations
- ☐ 80 Subpart S - Compulsory Radiotelephone Installations for Small Passenger Boats
- ☐ 80 Subpart T - Radiotelephone Installation Required for Vessels on the Great Lakes
- ☐ 80 Subpart U - Radiotelephone Installations Required by the Bridge-to-Bridge Act
- ☐ 80 Subpart V - Emergency Position Indicating Radio Beacons (EPIRB'S)
- ☐ 80 Subpart W - Global Maritime Distress and Safety System (GMDSS)
- ☐ 80 Subpart X - Voluntary Radio Installations
- ☐ 87 - Aviation Services
- ☒ 90 - Private Land Mobile Radio Services
- ☐ 94 - Private Operational-Fixed Microwave Service
- ☐ 95 Subpart A - General Mobile Radio Service (GMRS)
- ☐ 95 Subpart C - Radio Control (R/C) Radio Service
- ☐ 95 Subpart D - Citizens Band (CB) Radio Service
- ☐ 95 Subpart E - Family Radio Service
- ☐ 95 Subpart F - Interactive Video and Data Service (IVDS)
- ☐ 97 - Amateur Radio Service
- ☐ 101 - Fixed Microwave Services

Standard Test Conditions and Engineering Practices

Except as noted herein, the following conditions and procedures were observed during the testing:

In accordance with ANSI C63.4-1992/2001, section 6.1.9, and unless otherwise indicated in the specific measurement results, the ambient temperature of the actual EUT was maintained within the range of 10° to 40°C (50° to 104 °F) unless the particular equipment requirements specify testing over a different temperature range. Also, unless otherwise indicated, the humidity levels were in the range of 10% to 90% relative humidity.

Prior to testing, the EUT was tuned up in accordance with the manufacturer's alignment procedures. All external gain controls were maintained at the position of maximum and/or optimum gain throughout the testing.

Measurement results, unless otherwise noted, are worst-case measurements.



A2LA

"A2LA has accredited M. Flom Associates, Inc. Chandler, AZ for technical competence in the field of Electrical Testing. The accreditation covers the specific tests and types of tests listed on the agreed scope of accreditation. This laboratory meets the requirements of ISO/IEC 17025 – 1999 'General Requirements for the Competence of Testing and Calibration Laboratories' and any additional program requirements in the identified field of testing."

Certificate Number: **2152-01**



NIST

I am pleased to inform you that your laboratory has been validated by the Chinese Taipei Bureau of Standards, Metrology and Inspection (BSMT) under the Asia Pacific Economic Cooperation Mutual Recognition Agreement (APEC MRA). Your laboratory is now formally designated to act as a Conformity Assessment Body (CAB) under Appendix B, Phase I Procedures, of the APEC MRA between the American Institute in Taiwan (AIT) and the Taipei Economic and Cultural Representative Office (TECRO) in the United States, covering equipment subject to Electro-Magnetic Compatibility (EMC) requirements. The names of all validated and nominated laboratories will be posted on the NIST website at <http://ts.nist.gov/mra> under the 'Asia' category."

BSMT Number: **SL2-IN-E-041R**

List of General Information Required for Certification

In Accordance with FCC Rules and Regulations,
Part 2, 90 and Confidentiality

Sub-part 2.1033

(c)(1): **Name and Address of Applicant:**

Comtek Communications Technology, Inc.
357 W. 2700 South
Salt Lake City, UTAH 84115

Manufacturer:

Applicant

(c)(2): **FCC ID:** C6ZBST75

Model Number: BST-75

(c)(3): **Instruction Manual(s):**

Please see attached exhibits

(c)(4): **Type of Emission:** FM Voice

(c)(5): **Frequency Range, MHz (per 90.257):** 72.020 – 75.980

(c)(6): **Power Rating, Watts:** 0.120
☒ Switchable ☐ Variable ☐ N/A

FCC Grant Note:

(c)(7): **Maximum Power Rating, Watts (90.217):** 0.120

DUT Results: Passes ☒ Fails ☐

Subpart 2.1033 (continued)

(c)(8): Voltages & currents in all elements in final RF stage, including final transistor or solid-state device:

Collector Current, A	=	0.150
Collector Voltage, Vdc	=	12
Supply Voltage, Vdc	=	12

(c)(9): **Tune-Up Procedure:**

Please see attached exhibits

(c)(10): **Circuit Diagram/Circuit Description:**

Including description of circuitry & devices provided for determining and stabilizing frequency, for suppression of spurious radiation, for limiting modulation and limiting power.

Please see attached exhibits

(c)(11): **Label Information:**

Please see attached exhibits

(c)(12): **Photographs:**

Please see attached exhibits

(c)(13): **Digital Modulation Description:**

☐	Attached Exhibits
☒	N/A

(c)(14): **Test and Measurement Data:**

Follows

Name of Test: Carrier Output Power (Conducted)

Specification: 47 CFR 2.1046(a)

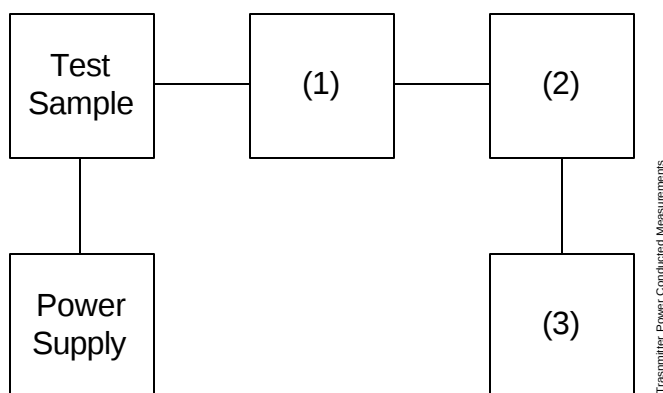
Guide: ANSI/TIA/EIA-603-1992, Paragraph 2.2.1

Measurement Procedure

A) The EUT was connected to a resistive coaxial attenuator of normal load impedance, and the unmodulated output power was measured by means of an RF Power Meter.

B) Measurement accuracy is $\pm 3\%$.

Transmitter Test Set-Up: RF Power Output



Asset	Description	s/n	Cycle	Last Cal
(1) Coaxial Attenuator				
X	i00231/2 PASTERNAK PE7021-30 (30 dB)	231 or 232	NCR	
	i00122/3 NARDA 766 (10 dB)	7802 or 7802A	NCR	
(2) Power Meters				
X	i00020 HP 8901A Power Mode	2105A01087	12 mo.	Apr-04
(3) Frequency Counter				
X	i00020 HP 8901A Frequency Mode	2105A01087	12 mo.	Apr-04

Name of Test: Carrier Output Power (Conducted)

Measurement Results
(Worst case)

Frequency of Carrier, MHz = 72.090000, 72.890000, 75.300000
Ambient Temperature = 23°C ± 3°C

Power Setting	RF Power, dBm	RF Power, Watts
High	20.7	0.120
Med	16.0	0.040
Low	10.0	0.010



Performed by:

David E. Lee, Compliance Test Manager

Name of Test: RF Power Output (Radiated)

Specification: 47 CFR 2.1046(a)

Test Equipment: As per attached page

Measurement Procedure (Radiated)

1. The EUT was placed on an open-field site and its radiated field strength at a known distance was measured by means of a spectrum analyzer. Equivalent loading was calculated from the equation $P_t = ((E \times R)^2 / 49.2)$ watts, where $R = 3m$.
2. Measurement accuracy is ± 1.5 dB.

NOTE: Measurements taken using vertically polarized screw-in whip antenna supplied with unit.

Measurement Results

g0520090: 2005-Feb-16 Wed 11:35:00

State: 2:High Power

Ambient Temperature: $23^{\circ}\text{C} \pm 3^{\circ}\text{C}$

Amps Mode:

Frequency Tuned, MHz	Frequency Emission, MHz	Meter, dBuV/m	CF, dB	ERP, dBm	ERP, milliWatts
72.090000	72.090000	82.23	9.8	-5.3	< 0.39
72.090000	72.090000	82.53	9.8	-5.0	< 0.39
72.090000	72.090000	81.58	9.8	-6.0	< 0.39
72.090000	72.090000	82.51	9.8	-5.1	< 0.39
72.090000	72.090000	82.44	9.8	-5.1	< 0.39
72.090000	72.090000	83.38	9.8	-4.2	< 0.39
72.090000	72.090000	83.47	9.8	-4.1	0.39
72.090000	72.090000	82.07	9.8	-5.5	< 0.39

Performed by:



Bobby Leanio

Name of Test: RF Power Output (Radiated) (Cont.)

g0520091: 2005-Feb-16 Wed 13:34:00

State: 2:High Power

Ambient Temperature: 23°C ± 3°C

Amps Mode:

Frequency Tuned, MHz	Frequency Emission, MHz	Meter, dBuV/m	CF, dB	ERP, dBm	ERP, milliwatts
72.890000	72.890000	81.49	9.74	-6.1	< 0.48
72.890000	72.890000	82.38	9.74	-5.3	< 0.48
72.890000	72.890000	84.47	9.74	-3.2	0.48
72.890000	72.890000	82.42	9.74	-5.2	< 0.48
72.890000	72.890000	81.57	9.74	-6.1	< 0.48
72.890000	72.890000	82.12	9.74	-5.5	< 0.48
72.890000	72.890000	83.39	9.74	-4.2	< 0.48
72.890000	72.890000	84.00	9.74	-3.6	< 0.48

g0520092: 2005-Feb-16 Wed 13:36:00

State: 2:High Power

Ambient Temperature: 23°C ± 3°C

Amps Mode:

Frequency Tuned, MHz	Frequency Emission, MHz	Meter, dBuV/m	CF, dB	ERP, dBm	ERP, Watts
75.300000	75.300000	83.23	9.58	-4.6	< 0.67
75.300000	75.300000	85.61	9.58	-2.2	< 0.67
75.300000	75.300000	86.09	9.58	-1.7	0.67
75.300000	75.300000	83.81	9.58	-4.0	< 0.67
75.300000	75.300000	84.28	9.58	-3.5	< 0.67
75.300000	75.300000	82.65	9.58	-5.1	< 0.67
75.300000	75.300000	85.88	9.58	-1.9	< 0.67
75.300000	75.300000	85.26	9.58	-2.5	< 0.67



Performed by:

Bobby Leanio

Name of Test: Field Strength of Spurious Radiation

Specification: 47 CFR 2.1053(a)

Guide: ANSI/TIA/EIA-603-1992/2001, Paragraph 1.2.12 and Table 16, 47 CFR 22.917

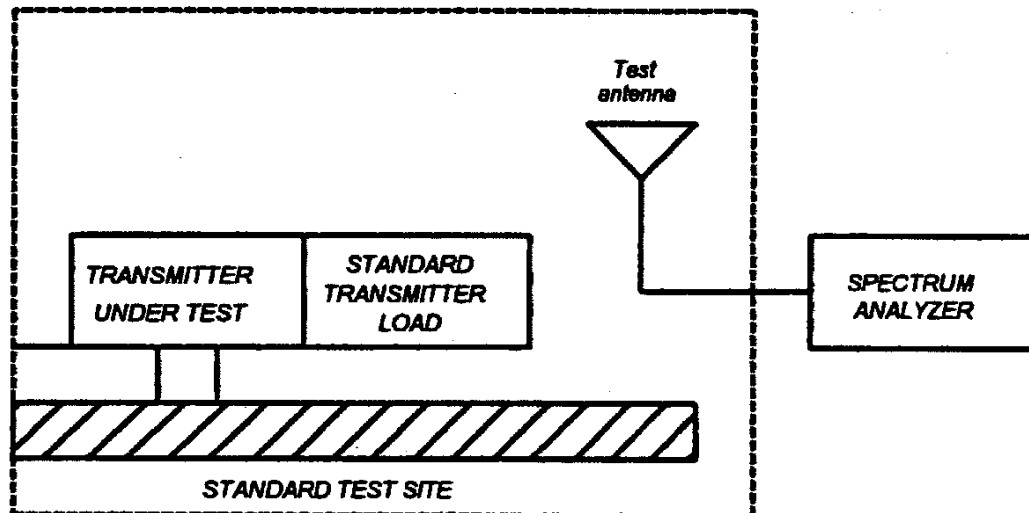
Measurement Procedure

Definition:

Radiated spurious emissions are emissions from the equipment when transmitting into a non-radiating load on a frequency or frequencies which are outside an occupied band sufficient to ensure transmission of information of required quality for the class of communications desired.

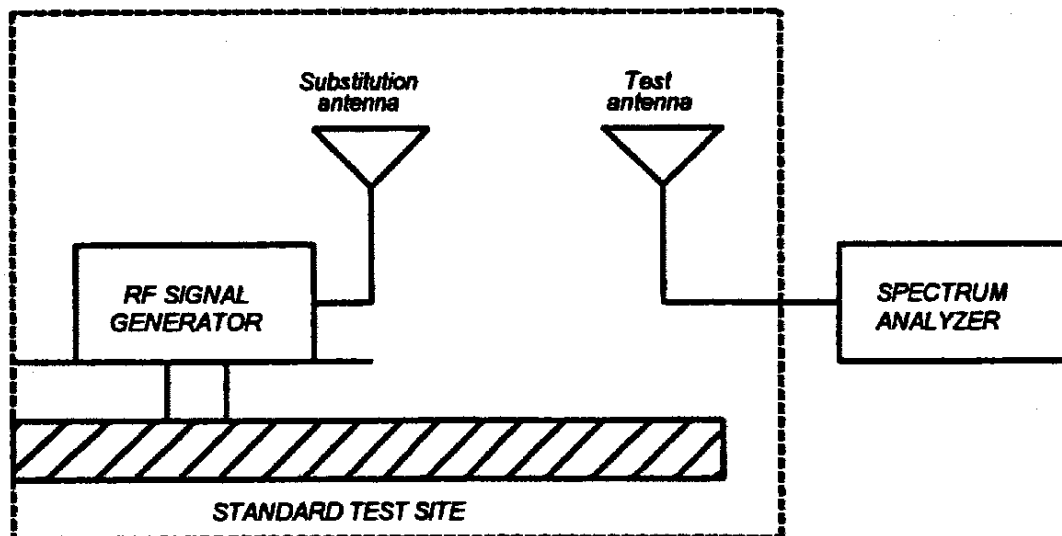
Method of Measurement:

- A) Connect the equipment as illustrated
- B) Adjust the spectrum analyzer for the following settings:
 - 1) Resolution Bandwidth 100 kHz (<1 GHz), 1 MHz (> 1GHz).
 - 2) Video Bandwidth = 3 times Resolution Bandwidth, or 30 kHz (22.917)
 - 3) Sweep Speed ≤ 2000 Hz/second
 - 4) Detector Mode = Mean or Average Power
- C) Place the transmitter to be tested on the turntable in the standard test site. The transmitter is transmitting into a non-radiating load that is placed on the turntable. The RF cable to this load should be of minimum length.



Name of Test: Field Strength of Spurious Radiation (Cont.)

- D) For each spurious measurement the test antenna should be adjusted to the correct length for the frequency involved. This length may be determined from a calibration ruler supplied with the equipment. Measurements shall be made from the lowest radio frequency generated in the equipment to the tenth harmonic of the carrier, except for the region close to the carrier equal to $\pm$ the test bandwidth (see section 1.3.4.4).
- E) For each spurious frequency, raise and lower the test antenna from 1 m to 4 m to obtain a maximum reading on the spectrum analyzer with the test antenna at horizontal polarity. Repeat this procedure to obtain the highest possible reading. Record this maximum reading.
- F) Repeat step E) for each spurious frequency with the test antenna polarized vertically.



- G) Reconnect the equipment as illustrated.
- H) Keep the spectrum analyzer adjusted as in step B).
- I) Remove the transmitter and replace it with a substitution antenna (the antenna should be half-wavelength for each frequency involved). The center of the substitution antenna should be approximately at the same location as the center of the transmitter. At lower frequencies, where the substitution antenna is very long, this will be impossible to achieve when the antenna is polarized vertically. In such case the lower end of the antenna should be 0.3 m above the ground.

Name of Test: Field Strength of Spurious Radiation (Cont.)

- J) Feed the substitution antenna at the transmitter end with a signal generator connected to the antenna by means of a non-radiating cable. With the antennas at both ends horizontally polarized and with the signal generator tuned to a particular spurious frequency, raise and lower the test antenna to obtain a maximum reading at the spectrum analyzer. Adjust the level of the signal generator output until the previously recorded maximum reading for this set of conditions is obtained. This should be done carefully repeating the adjustment of the test antenna and generator output.
- K) Repeat step J) with both antennas vertically polarized for each spurious frequency.
- L) Calculate power in dBm into a reference ideal half-wave dipole antenna by reducing the readings obtained in steps J) and K) by the power loss in the cable between the generator and the antenna and further corrected for the gain of the substitution antenna used relative to an ideal half-wave dipole antenna.
- M) The levels recorded in step L) are absolute levels of radiated spurious emissions in dBm. The radiated spurious emissions in dB can be calculated by the following:

Radiated spurious emissions dB =

$$10\log_{10}(\text{TX power in watts}/0.001) - \text{the levels in step I)}$$

NOTE: It is permissible that other antennas provided can be referenced to a dipole.

Test Equipment

Asset	Description	s/n	Cycle	Last Cal
Transducer				
i00088	EMCO 3109-B 25MHz-300MHz	2336	24 mo.	Sep-03
X i00089	Apriel 2001 200MHz-1GHz	001500	24 mo.	Sep-03
X i00103	EMCO 3115 1GHz-18GHz	9208-3925	24 mo.	Jan-04
Amplifier				
X i00028	HP 8449A	2749A00121	12 mo.	May-04
Spectrum Analyzer				
X i00029	HP 8563E	3213A00104	12 mo.	May-04
X i00033	HP 85462A	3625A00357	12 mo.	Sep-04
Substitution Generator				
X i00067	HP 8920A Communication TS	3345U01242	12 mo.	Jun-04
i00207	HP 8753D Network Analyzer	3410A08514	12 mo.	Jul-04

Microphone, Antenna Port, and Cabling

Microphone	<u>Yes</u>	Cable Length	<u>1.0</u>	Meters
Antenna Port Terminated	<u>Yes</u>	Load	<u>50</u>	Antenna Gain
All Ports Terminated by Load	<u>Yes</u>	Peripheral	<u>None</u>	<u>N/A</u>

Name of Test: Field Strength of Spurious Radiation

Measurement Results

g0520093: 2005-Feb-16 Wed 13:40:00

STATE: 2:High Power

Ambient Temperature: 23°C ± 3°C

Frequency Tuned, MHz	Frequency Emission, MHz	ERP, dBm	ERP, dBc
72.100000	144.186300	-61.3	-82.0
72.900000	145.801300	-51.4	-72.1
75.310000	150.610000	-35.7	-56.4
72.100000	216.286300	-36.7	-57.4
72.900000	218.701300	-48.5	-69.2
75.310000	225.925000	-51.7	-72.4
72.100000	288.386300	-37.4	-58.1
72.900000	291.601300	-32.2	-52.9
75.310000	301.235000	-42.9	-63.6
72.100000	360.486300	-43.6	-64.3
72.900000	364.486300	-42.3	-63.0
75.310000	376.562500	-30.8	-51.5
72.100000	432.586300	-46.2	-66.9
72.900000	437.386300	-45.1	-65.8
75.310000	451.872500	-34.1	-54.8
72.100000	504.686300	-42.9	-63.6
72.900000	510.286300	-44.3	-65.0
75.310000	527.178800	-26.2	-46.9
72.100000	576.786300	-23.7	-44.4
72.900000	583.186300	-41.3	-62.0
75.310000	604.248000	-37.8	-58.5
72.100000	648.886300	-47.3	-68.0
72.900000	656.086300	-55.2	-75.9
75.310000	679.758000	-36.4	-57.1
72.100000	720.986300	-50.8	-71.5
72.900000	728.986300	-52.8	-73.5
75.310000	755.068000	-44.9	-65.6



Performed by:

Bobby Leanio

Name of Test: Occupied Bandwidth

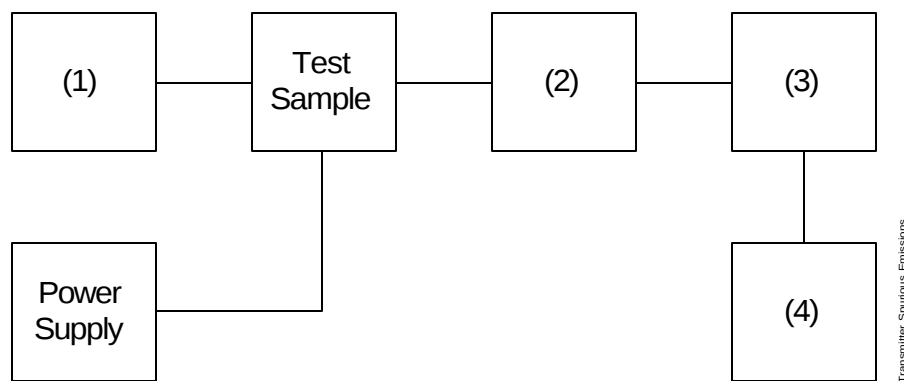
Specification: 47 CFR 2.1049(c)(1), 47 CFR 90.217 (a) Exemption

Guide: ANSI/TIA/EIA-603-1992, Paragraph 2.2.11

Measurement Procedure

- A) The EUT and test equipment were set up as shown below
- B) For EUTs supporting audio modulation, the audio signal generator was adjusted to the frequency of maximum response and with output level set for $\pm 2.5/\pm 1.25$ kHz deviation (or 50% modulation). With level constant, the signal level was increased 16 dB.
- C) For EUTs supporting digital modulation, the digital modulation mode was operated to its maximum extent.
- D) The Occupied Bandwidth was measured with the Spectrum Analyzer controls set as shown on the test results.

Transmitter Test Set-Up: Occupied Bandwidth



Asset	Description	s/n	Cycle	Last Cal
(1) Audio Oscillator/Generator				
X i00017	HP 8903A Modulation Meter	2216A01753	12 mo.	Apr-04
(2) Coaxial Attenuator				
X i00231/2	PASTERNAK PE7021-30 (30 dB)	231 or 232	NCR	
i00123	NARDA 766 (10 dB)	7802A	NCR	
(3) Interface				
X i00021	HP 8954A Transceiver Interface	2146A00159	NCR	
(4) Spectrum Analyzer				
X i00048	HP 8566B Spectrum Analyzer	2511A01467	12 mo.	Oct-04
i00029	HP 8563E Spectrum Analyzer	3213A00104	12 mo.	May-04

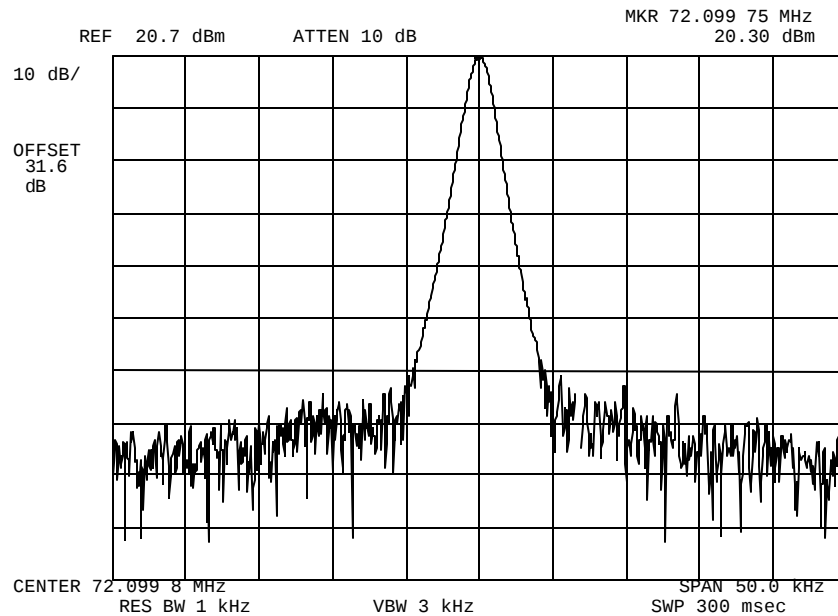
Name of Test: Occupied Bandwidth - 47 CFR 90.217 (a)

Measurement Results

g0520096: 2005-Feb-19 Sat 10:53:00

State: 2:High Power

Ambient Temperature: 23°C ± 3°C



Power:	HIGH
Modulation:	NONE
Unmodulated Carrier Level:	20.7dBm (120mW)



Performed by:

David E. Lee, Compliance Test Manager

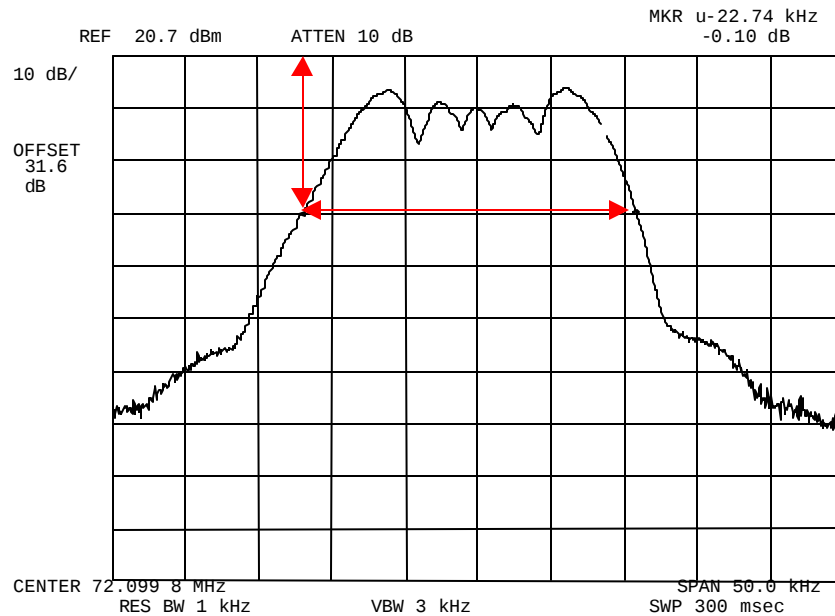
Name of Test: Occupied Bandwidth - 47 CFR 90.217 (a)

Measurement Results

g0520098: 2005-Feb-19 Sat 10:55:00

State: 2:High Power

Ambient Temperature: 23°C ± 3°C



Power:	HIGH
Modulation:	Maximum Deviation
Occupied Bandwidth at -30dBc:	22.74kHz
Frequency Stability (Limit 50ppm):	+3.75kHz @ 75MHz
Max Occupied Bandwidth (Limit 40kHz):	30.24kHz



Performed by:

David E. Lee, Compliance Test Manager

Name of Test: Frequency Stability (Temperature Variation)

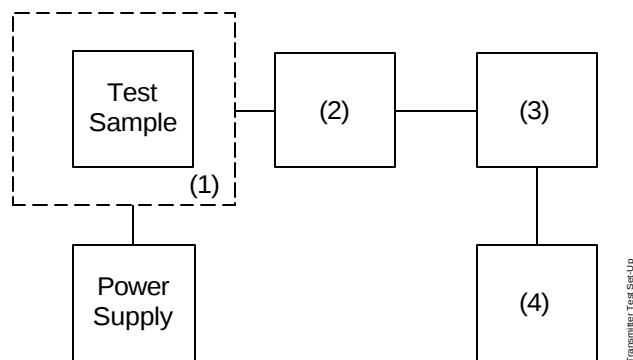
Specification: 47 CFR 2.1055(a)(1)

Guide: ANSI/TIA/EIA-603-1992, Paragraph 2.2.2

Measurement Procedure

- A) The EUT and test equipment were set up as shown on the following page.
- B) With all power removed, the temperature was decreased to -30°C and permitted to stabilize for three hours. Power was applied and the maximum change in frequency was noted within one minute.
- C) With power OFF, the temperature was raised in 10°C steps. The sample was permitted to stabilize at each step for at least one-half hour. Power was applied and the maximum frequency change was noted within one minute.
- D) The temperature tests were performed for the worst case.

Transmitter Test Set-Up: Temperature Variation

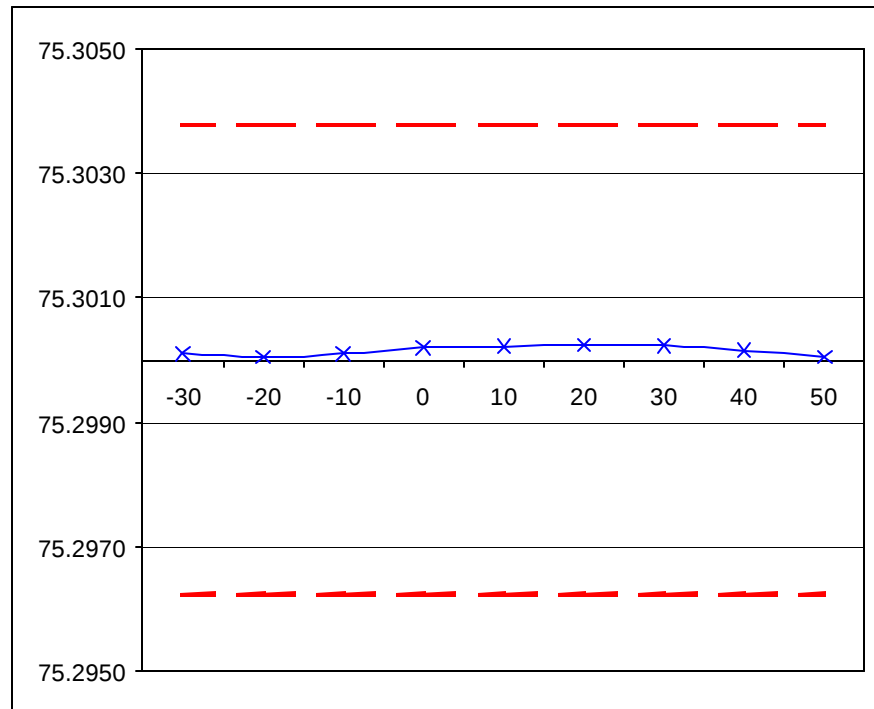


Asset	Description	s/n	Cycle	Last Cal
(1) Temperature, Humidity, Vibration				
X i00027	Tenney Temp. Chamber	9083-765-234	NCR	
(2) Coaxial Attenuator				
X i00231/2	PASTERNAK PE7021-30 (30 dB)	231 or 232	NCR	
i00122/3	NARDA 766 (10 dB)	7802 or 7802A	NCR	
(3) RF Power				
X i00067	HP 8920A Communications TS	3345U01242	12 mo.	Jun-04
(4) Frequency Counter				
X i00067	HP 8920A Communications TS	3345U01242	12 mo.	Jun-04

Name of Test: Frequency Stability (Temperature Variation)

Measurement Results

State: Room Temperature: 25°C ± 3°C




Performed by:

David E. Lee, Compliance Test Manager

END OF TEST REPORT

**Testimonial
and
Statement of Certification**

This is to Certify:

1. **That** the application was prepared either by, or under the direct supervision of, the undersigned.
2. **That** the technical data supplied with the application was taken under my direction and supervision.
3. **That** the data was obtained on representative units, randomly selected.
4. **That,** to the best of my knowledge and belief, the facts set forth in the application and accompanying technical data are true and correct.

Certifying Engineer:



David E. Lee, Compliance Test Manager