

Southwest Microwave, Inc.

**9055 South McKemy Street
Tempe, Arizona 85284-2946**

April 13, 2004

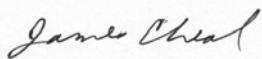
**Federal Communication Commission
Office of Engineering and Technology**

Subject: Test Site:

Processing Staff:

The MicroTrack sensor is designed as a low power unlicensed sensor compliant with 15.209 over the frequency band of 18.2 MHz to 25.4 MHz. Paragraph 15.31 suggests an open field site be used for field strength measurements whenever possible. Contract test facilities that conform to 2.948 do not have the space required to bury 200 meters of leaky cable in a straight line; therefore the intentional radiation emission testing was performed at Southwest Microwave, Inc. Maricopa test site. This site as shown in the test setup photos is a level open 31 acre field with more than 30 meters access in the area surrounding the 200 meters of radiating cable. The open field site is believed to provide the most accurate data to show compliance with 15.209. The alternative is to conduct the tests at three different sites that can be demonstrated to be typical. Typical user sites may have tall fences or buildings that serve to contain the field and cause lower levels of field strength at 30 meters. The data recorded at the Maricopa test site for cables buried at 6 inches, 9 inches and on the surface of the ground clearly shows compliance with 15.209 and is believed to provide an accurate representation of the maximum field strength that can be expected from the MicroTrack Perimeter Intrusion Sensor.

Sincerely,



James Cheal
Director of Research
Southwest Microwave, Inc.