



ROTHENBUHLER ENGINEERING®

TYPE OF EXHIBIT: Request for Exemption

MANUFACTURER: Rothenbuhler Engineering, Inc.
524 Rhodes Road
Sedro Woolley, WA 98284-0708

MODELS: 1673-1, 1673-1-A, 1673-1-V, 1673-1-AV

FCC ID: CW21673-1

IC: 2758A-16731

DATE: January 27, 2014

Rothenbuhler Engineering requests an exemption be given to the data rate requirement of 90.203(j)(3) for the following reasons:

The data rate for our units is 1200 bits per second (1200 BAUD). The application is for digital remote control of devices (blasting equipment). The information passed over the air is small data packets containing a limited set of commands and responses, there is no transmission of arbitrary data, or voice. The duty cycle of transmission is extremely low. The normal operation would have perhaps 15 command / response transmissions, consisting of approximately 300ms bursts over the period of 10 minutes or so. This may typically happen once or twice a day, for an overall transmission duty cycle of approximately 0.8% during use, or approximately 0.01% per day. Given the low amount of information transmitted, we would like to use a low data rate modem (i.e. 1200 bits per second). With lesser bandwidth efficiency, we can use a wider FM deviation to achieve greater operating range, and minimize the local oscillator accuracy and phase noise requirements, lowering the cost of the system.

Respectfully,

X Richard B. Taft

Richard B. Taft, P.E., Engineering Manager