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Office of Engineering and Technology Laboratory
Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Rd
Columbia MD 21046-1609
USA

Subject: Orion Electronics Limited
FCC ID: EFCST800
GPS Vehicle Locator
Submission of Test Reports

The ST800 Guardian is an automated vehicle locator containing a GPS module, a CDMA/AMPS dual mode 800MHz cellular module and host /control circuitry. The ST800 cannot be used as a standard cellular phone and it is not a consumer device. The unit is used for automated data logging, accepting data calls and automated data transmissions.

Orion Electronics Limited is seeking approval of FCC part 15 and part 22 for the ST800 Guardian, where FCC tests were completed at the following locations:

- 1) Electronics Test Centre, MPB Technologies Incorporated : For all of FCC part 15 and part 22 excluding part 22.355.
- 2) Sierra Wireless Incorporated : For part 22.355.

The reasoning behind the second test location follows:

Sierra Wireless, Inc. is the manufacturer of the SB508 CDMA/AMPS cellular module contained within the Orion Electronics ST800 unit. The SB508 received FCC part 15 and part 22 approval previously as a Qualcomm PDQ-800 phone. (The handset division of Qualcomm has split into two companies: Sierra Wireless Incorporated and Kyocera Wireless Corporation). Sierra Wireless completed the part 22.355 testing for 'transmit frequency stability' for the SB508 due to the fact that specialized CDMA test equipment was required for this test that the Electronics Test Centre could not obtain. Orion Electronics Limited received verbal notification from FCC employee Richard Febina on Feb. 5, 2002, that for FCC part 22, a partial test from a second location for a licensed device could be accepted for submission. The results for the small test section of part 22.355 'transmit frequency stability' are being submitted for FCC approval as obtained from Sierra Wireless.

Please find attached the following reports for FCC submission:

- Exhibit 2a: 'Test Report on ST800 Guardian in accordance with FCC Pt 2, Pt. 15 Subpart B and Pt 22 (current as of April 20023), and IC RSS-102 (1999)', Electronics Test Centre.
- Exhibit 2b: 'SB508 Transmit Frequency Stability Test Results', Sierra Wireless Incorporated.

Exhibit 2c: 'Verification of FCC Parts 22.933, 22.901(d) for the ST800 Guardian', Orion Electronics Limited. (This document contains Lucent Technologies CDG2 test results provided by Sierra Wireless)

Sincerely,
David Roddis
Marketing Manager
Orion Electronics Limited