

WILKINSON) BARKER) KNAUER) LLP

2300 N STREET, NW
SUITE 700
WASHINGTON, DC 20037-1128
TEL 202.783.4141
FAX 202.783.5851
www.wbklaw.com

JEFFREY COHEN
202 383-3369
jcohen@wbklaw.com

December 4, 2000

By Federal Express and Electronic Submission

Mr. Joe Dichoso
Federal Communications Commission
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21046

Re: *Schlumberger Resource Management Services, Inc.*
Response to Request for Further Information
FCC ID: F9C-26113097
Reference No.: 16441

Dear Mr. Dichoso:

We are writing in response to your request for further information concerning an application to transfer the FCC Identification number of device F9C-26113097. On behalf of Schlumberger Resource Management Services, Inc. ("Applicant"), in August, 2000, we submitted applications to change all of the FCC Identification numbers held by CellNet Data Systems, Inc. ("CellNet"), grantee code H6N, to Applicant's grantee code, F9C. The purpose of these applications was to notify the Commission that Applicant purchased the assets of CellNet, including the equipment authorizations. Pursuant to the direction of Richard Fabina, Chief, Equipment Authorization Branch, the submissions consisted of a separate Form 731 for each of the devices and a single Form 159, which included payment for a single fee intended to cover all of the FCC Identification number transfers.

On October 5, 2000, we received e-mail correspondence from you requesting further information regarding F9C-26113097. Specifically, you asked that we submit external photographs of the device and an exhibit indicating how the device complies with RF safety requirements. After further discussion with Mr. Fabina, we now provide additional information pursuant to section 2.933 of the Commission's rules. Specifically, we enclose an exhibit responding to section 2.933 with related attachments, including a copy of an external photograph

of the device, a sketch of the new label for the device, a copy of the Form 731 previously filed electronically with an exhibit describing the transaction, a copy of the Form 159 filed on behalf of Applicant and submitted for all of the equipment authorizations related to the transaction, and a copy of your e-mail sent requesting further information. We are also submitting all of the above materials and a copy of this letter electronically.

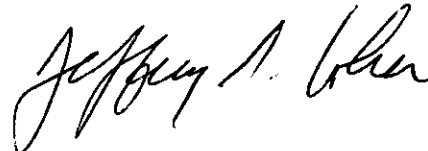
Regarding section 2.933(b)(5), referencing the photographs required by section 2.1033(b)(7), as mentioned above, we are providing photographs of the exterior appearance, and a sketch of the new label to be used in future production. The positioning of this new label on the device will not change from the positioning of the old label.

With respect to your request for an exhibit indicating how the device complies with RF emissions requirements, section 1.1307(b)(1), of the Commission's rules, which is referenced by section 15.247(b)(4), categorically excludes Applicant from the requirement to conduct a routine environmental evaluation for RF exposure for the subject device. The device, a Part 15 Spread Spectrum Transmitter, is not listed in subsection 1.1307(b)(1) Table 1 or in subsection 1.1307(b)(2), and therefore falls into the excluded category. Accordingly, the Commission's rules do not require the submission of an RF evaluation.

Should you have any questions regarding this matter, please contact Zachary Zehner at (202) 383-3424 to expedite resolving any outstanding issues regarding the pending application.

Sincerely,

WILKINSON BARKER KNAUER, LLP

A handwritten signature in black ink, appearing to read "Jeffrey S. Cohen".

By: Jeffrey S. Cohen
Zachary A. Zehner

Enclosures

Exhibit

The following exhibit represents the “attached statement” and information required by section 2.933(b) of the Commission’s rules for an application for an equipment authorization where no change in design, circuitry, or construction is involved:

1) Original Identification Used Prior to Change in Identification (section 2.933(b)(1)):

H6N-26113097.

2) The Date of the Original Equipment Authorization (section 2.933(b)(2)):

February 9 1998. See attachment for copy of original equipment authorization.

3) How the Equipment Bearing Modified Identification Differs from Original Equipment (section 2.933(b)(3)):

The equipment bearing the modified identification does not differ from the original equipment.

4) Whether the Original Test Results Continue to be Representative of and Applicable to the Equipment Bearing Changed Identification (section 2.933(b)(4)):

The original test results continue to be representative of and applicable to the equipment bearing the changed identification.

5) The Photographs Showing Exterior of Appearance of Equipment (section 2.933(b)(5)):

See attachment.

Constantine, Jason

From: oetech@fccsun07w.fcc.gov
Sent: Thursday, October 05, 2000 10:49 AM
To: jcohen@wbklaw.com

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Joe Dichoso
jdichoso@fcc.gov
FCC Application Processing Branch

Re: FCC ID F9C26113097
Applicant: Schlumberger Resource
Management Services Inc.
Correspondence Reference Number: 16441
731 Confirmation Number: EA98621
Date of Original E-Mail: 10/05/2000

- 1) Please provide external photo's of the device. Including applicable antennas.
- 2) Also, Indicate how the device complies with the new RF safety requirements. Place your RF safety exhibit reply in the RF exposure info folder.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

DO NOT reply to this e-mail by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, in order to expedite processing, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.



Federal Communications Commission

**The Form 731 Application You Just Entered Has Been
Submitted
Successfully to the Laboratory Division.
Please Record The Following Information For Future Reference:**

If any information has been entered incorrectly on the 731 or 159 form, please contact btaube@fcc.gov for correction rather than submitting a second 731 or 159.

Form 731 Confirmation Number:	EA98621
FCC ID:	F9C26113097
Date of Submission:	Aug 31 2000 5:54PM
Press this button to begin document submission process.	Press this button to go directly to FCC Remittance Form (Form 159).
Proceed to Exhibits Form	Proceed to Fee Form (159)

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*Mail your comments or suggestions (To: btaube@fcc.gov)
FCC - Federal Communications Commission - FCC_731*

**FEDERAL COMMUNICATIONS COMMISSION - FCC FORM 731
APPLICATION FOR EQUIPMENT AUTHORIZATION**Approved by
3060 - 0057
Expires 9/30/

You will be presented with the FCC FORM 159, Fee Remittance Advice after submitting your application and obtain Advice, FCC Form 159, must currently be submitted in paper form along with payment to the address indicated in th FCC Form 159 is not currently available.

Item 1. Applicant's complete, legal business name: Schlumberger Resource Management Services Inc.

Item 2. Applicant's mailing address

Line 1: 1600 Alabama Highway 229

Line 2:

P.O.Box:

City: Tallassee

State: AL Country(if foreign address): Zip/Postal Code: 36078

Item 3. FCC ID: Grantee code: t9c * Equipment Product Code (14 characters maximum): 26113097

Item 4. Person at the applicant's address to receive grant or for contact:

First Name: Jim

Last Name: Brennan

Title:

E-mail:

Mail St
Telepho
Fax No:

Item 5. Instead of Applicant, FCC is authorized to mail original Grant to:

Firm Name:

Address Line 1:

P.O.Box:

Address Line 2:

City:

Country(if foreign address):

Zip/Postal Code:

Person at above address to receive Grant:

First Name:

Last Name:

Title:

Mail Stop:

Item 6. Technical Contact:

Firm Name:

Telephone:

Ext:

Fax No:

First Name:

Middle Initial:

Last Name:

Address Line 1:

P.O.Box:

Address Line 2:

City:

Country(if foreign address):

Zip/Postal Code:

E-mail:

Item 7. Non-Technical Contact:

Firm Name:

Telephone:

Ext:

Fax No:

Wilkinson Barker Knauer, LLP

202-783-4141

202-783-5851

First Name:

Middle Initial:

Last Name:

Jeffrey

S

Cohen

[illegible]

Read each certification carefully before answering and signing this WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONS TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 50

Item 15. SECTION 5301 (ANTI-DRUG ABUSE) CERTIFICATION:

The applicant must certify that neither the applicant nor any party to the application is subject to a denial of Federal Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862 because of a conviction for possession or distribution 1.2002(b) for the definition of a "party" for these purposes.

Does the applicant or authorized agent so certify? ☒ Yes ☐ No

Item 16. APPLICANT/AGENT CERTIFICATION:

I certify that I am authorized to sign this application. All of the statements herein and the exhibits attached hereto, are true and correct to the best of my knowledge and belief. IN accepting a Grant of Equipment Authorization issued by the FCC as a result of the representations made for (1) labeling the equipment with the exact FCC ID specified in this application, (2) compliance statement labeling of the equipment with the applicable technical rules. If the applicant is not the actual manufacturer of the equipment, I have been made with the manufacturer to ensure that production units of this equipment will continue to comply with the

Authorizing an agent to sign this application, is done solely at the applicant's discretion; however, the applicant remains responsible for the application.

If an agent has signed this application on behalf of the applicant, a written letter of authorization which includes information above section 5301 (Anti-Drug Abuse) Certification statement has been provided by the applicant. It is understood that the FCC upon request, and that the FCC reserves the right to contact the applicant directly at any time.

*** Signature of Authorized Person Filing:**

Title of author

Vice President

Complete items below if an agent signs the application

Firm Name:

Telephone:

Ext:

Fax No:

First Name:

Middle Initial: Last Name:

Address Line 1:

P.O.Box:

Address Line 2:

City:

State:

Country(if foreign address): Zip/Pos

E-mail:

NOTE: An asterisk "*" preceding a field indicates it must be completed before this application can be submitted.

Continue

Clear

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*Mail your comments or suggestions (To: btaube@fcc.gov)
FCC - Federal Communications Commission - FCC_731*

**Federal Communications Commission****Confirmation Number: EA98621****FCC ID: F9C26113097****Thu Sep 21 15:10:19 EDT 2000**

Status	File Size (bytes)	File Description	Exhibit Type	File Format
	3487	Amendment to power level	Cover Letters	WordPerfect

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Mail your comments or suggestions (To: btaube@fcc.gov)

FCC - Federal Communications Commission -

Description of Transaction

On July 17, 2000, we notified the Commission, pursuant to section 2.929(d) of the Commission's rules, 47 C.F.R. § 2.929(d), of the transfer of the equipment authorizations listed below from CellNet Data Systems, Inc. ("CellNet") to Schlumberger Resource Management Services, Inc. ("SRMS").

On May 16, 2000, SRMS consummated its purchase of the assets of CellNet. Accordingly, all equipment authorizations under CellNet's grantee code, H6N, should be transferred to SRMS. SRMS is presently a grantee of equipment authorizations, with grantee code F9C, that are used for purposes very similar to the CellNet authorizations. Specifically, both Schlumberger and CellNet have manufactured equipment designed to provide automatic utility meter reading services using fixed and mobile data networks. Therefore, SRMS can adequately ensure and accept responsibility for continued compliance of the CellNet authorizations with the FCC's regulations.

Pursuant to FCC staff instruction from Mr. Richard Fabina, we have prepared a separate Form 731 application for each FCC ID number. We are also submitting a single fee, in the amount of \$940, with the first application, which serves to cover all application fee requirements with respect to all FCC ID numbers involved with this transaction.

The following equipment authorizations are to be transferred to SRMS:

H6N-26112495
H6N-26113097
H6N-262101296
H6N-CCM-92-STD
H6N-CMM1100
H6N-CMM1101
H6N-CMM1102
H6N-CMM1200
H6N-CMM1301
H6N-CMM1305
H6N-CMM1400
H6N-CMM1401
H6N-CMM2100
H6N-CMM2200
H6N-CRR-95-STD
H6N-CRR-96-STD
H6N-RTOMM-9
H6N-SCM3100
H6N-TOMM-11E
H6N-TOMM-44E

STAMP AND RETURN

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING (1) LOCKBOX #358315		FEDERAL COMMUNICATIONS COMMISSION REMITTANCE ADVICE PAGE NO. _____ OF _____ FCC/MELLON		APPROVED BY OMB 3060-058 AUG 3 1 1999 USE FOCUS ONLY	
SECTION A - Payer Information					
(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card) Wilkinson Barker Knauer, LLP				(3) TOTAL AMOUNT PAID (dollars and cents) \$940.00	
(4) STREET ADDRESS LINE NO. 1 2300 N Street, N.W., Suite 700					
(5) STREET ADDRESS LINE NO. 2					
(6) CITY Washington				(7) STATE DC	(8) ZIP CODE 20037-1128
(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 202-783-4141				(10) COUNTRY CODE (IF NOT IN U.S.A.)	
If payer name and the applicant name are different, complete Section B. If more than one applicant, use continuation sheets (Form 159-C).					
SECTION B - Applicant Information					
(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card) Schlumberger Resource Management Service					
(12) STREET ADDRESS LINE NO. 1 1600 Alabama Highway 229					
(13) STREET ADDRESS LINE NO. 2					
(14) CITY Tallahassee				(15) STATE AL	(16) ZIP CODE 36078
(17) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE) 334-283-6555				(18) COUNTRY CODE (IF NOT IN U.S.A.)	
SECTION C - Payment Information					
(19A) FCC Call Sign/Other ID	(20A) Payment Type Code(PTC) EGC	(21A) Quantity 1	(22A) Fee Due for (PTC) in Block 20A \$940.00	FCC USE ONLY	
(23A) FCC CODE 1 F9C26112495		(24A) FCC CODE 2 13EA98587			
(19B) FCC Call Sign/Other ID	(20B) Payment Type Code(PTC)	(21B) Quantity	(22B) Fee Due for (PTC) in Block 20B	FCC USE ONLY	
(23B) FCC CODE 1		(24B) FCC CODE 2			
(19C) FCC Call Sign/Other ID	(20C) Payment Type Code(PTC)	(21C) Quantity	(22C) Fee Due for (PTC) in Block 20C	FCC USE ONLY	
(23C) FCC CODE 1		(24C) FCC CODE 2			
(19D) FCC Call Sign/Other ID	(20D) Payment Type Code(PTC)	(21D) Quantity	(22D) Fee Due for (PTC) in Block 20D	FCC USE ONLY	
(23D) FCC CODE 1		(24D) FCC CODE 2			
SECTION D - Payer and Applicant Information (Required)					
(25) PAYER TIN 0521264167		(26) Complete this block only if applicant name in B-11 is different from payer name in A-2 APPLICANT TIN 0 510204865			
SECTION E - Certification					
(27) CERTIFICATION STATEMENT I, Jeffrey S. Cohen, certify under penalty of perjury that the foregoing and supporting information (PRINT NAME) are true and correct to the best of my knowledge, information, and belief. SIGNATURE <i>Jeffrey S. Cohen</i>					
SECTION F - Credit Card Payment Information					

Wilkinson Barker Knauer, LLP
2300 N Street N.W., Suite 700
Washington, D.C. 20037-1128

16-3
540 00012

58726

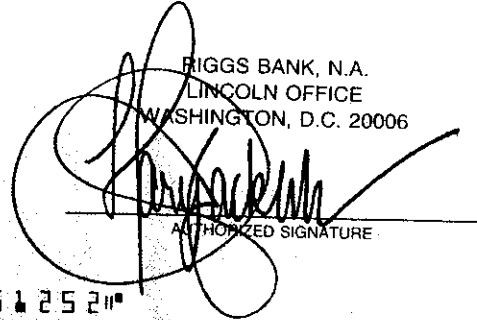
Date 08/29/00

\$940.00

PAY Nine Hundred Forty and 00/100 Dollars

TO THE
ORDER
OF

FEDERAL COMMUNICATIONS COMMISSION

RIGGS BANK, N.A.
LINCOLN OFFICE
WASHINGTON, D.C. 20006

AUTHORIZED SIGNATURE

⑈058726⑈ ⑆054000030⑆ 08451252⑈

**FEDERAL COMMUNICATIONS
COMMISSION**
WASHINGTON, D.C. 20554

**GRANT OF EQUIPMENT
AUTHORIZATION
Certification**

CellNet Data Systems
125 Shoreway Road

San Carlos, CA 94070

Date of Grant: 02/09/1998

Application Dated: 10/01/1997

Attention: Forrest Fulton

NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is **VALID ONLY** for the equipment identified hereon for use under the Commission's Rules and Regulations listed below.

FCC IDENTIFIER
Name of Grantee

H6N-26113097
CellNet Data Systems

Equipment Class: **Part 15 Spread Spectrum
Transmitter**

Notes: LAN Transmitter Max. output
power 420 milliwatts
Professional installation of
this transmitter is required

<u>Grant Notes</u>	<u>FCC Rule Parts</u>	<u>Frequency Range (MHZ)</u>	<u>Output Watts</u>	<u>Frequency Tolerance</u>	<u>Emission Designator</u>
37	15	911.58 - 917.58		%	

37: This device has shown compliance with new rules adopted under Docket 87-389 and is not affected by Section 15.37, transition rule.

Mail To:
Mike I Kuo,
Compliance Consulting Services, Inc.
1366 Bordeaux Drive
Sunnyvale, CA 95089

9710298315615002

POWER
PK

TRANSMIT

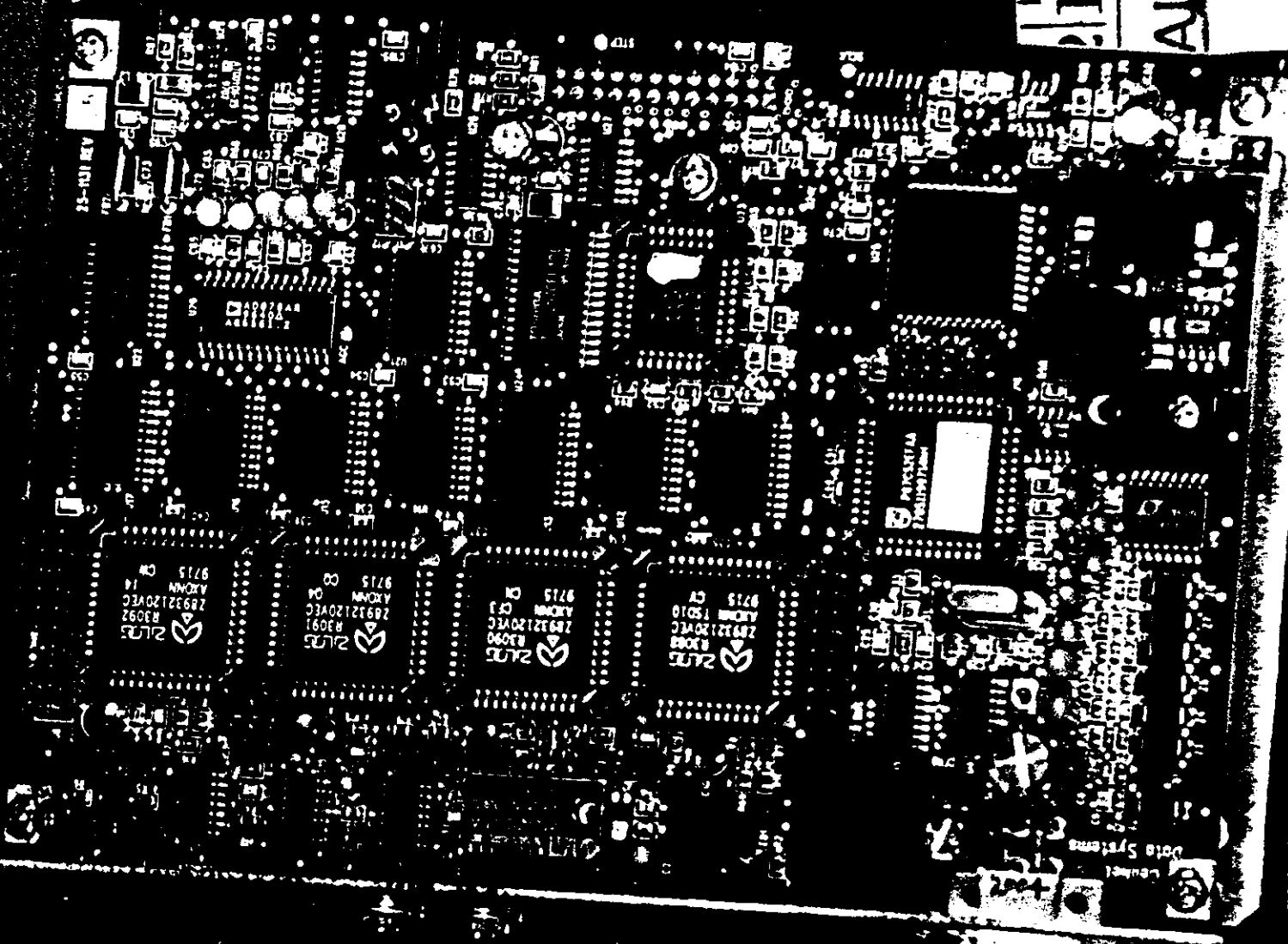
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ASSY 2

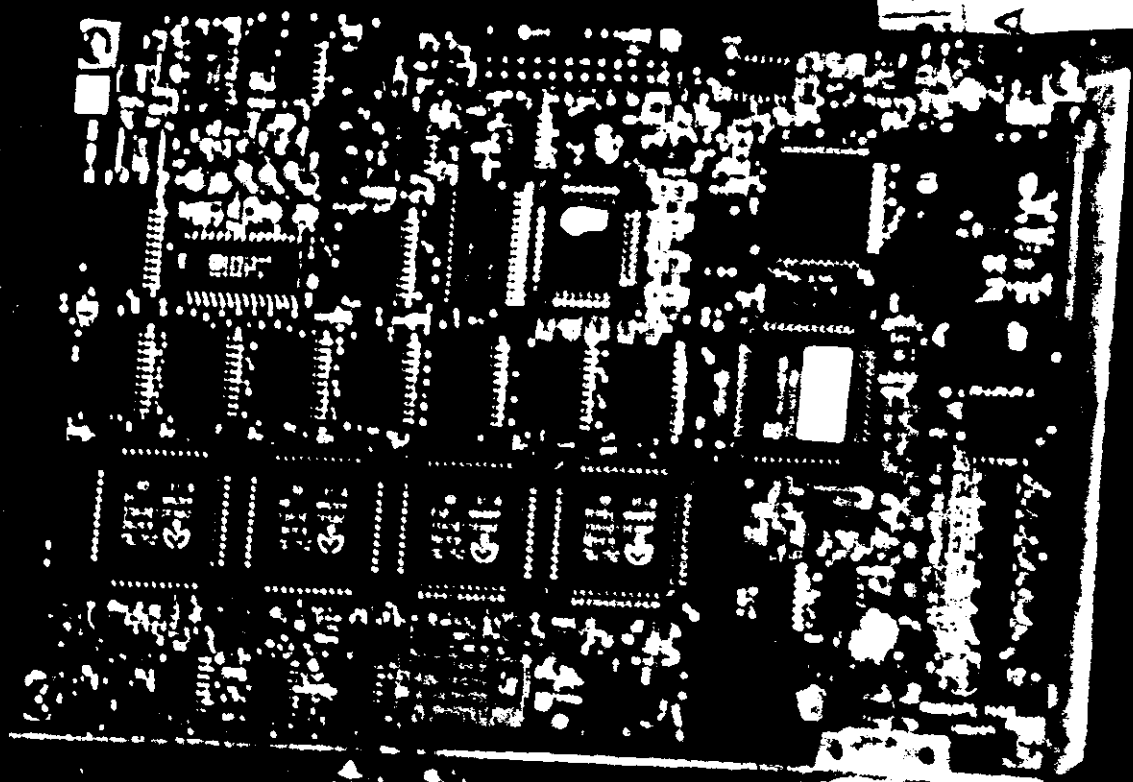
6077

2/3

21 200
AINTS
1373



ME
15



AINES
6373

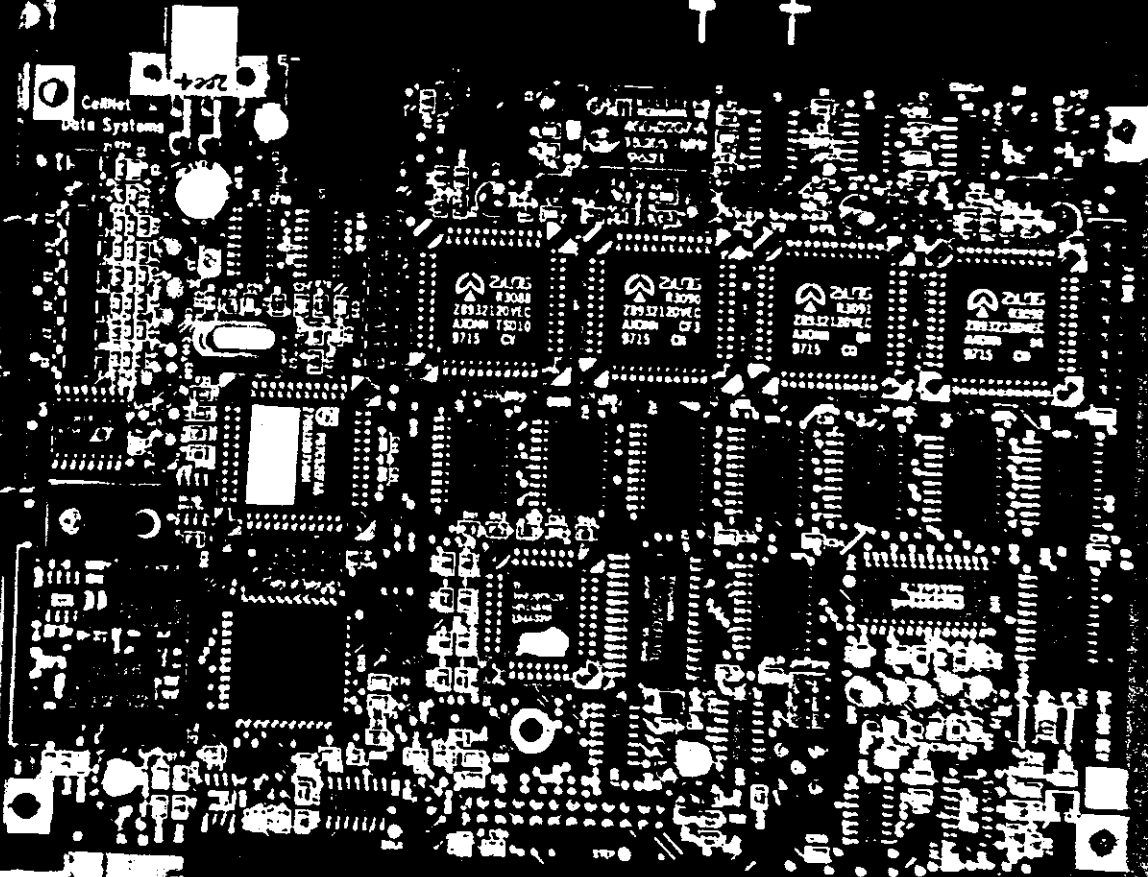
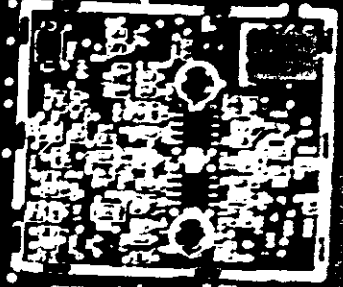
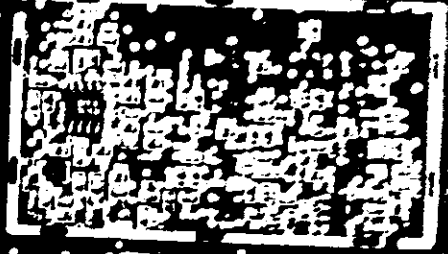
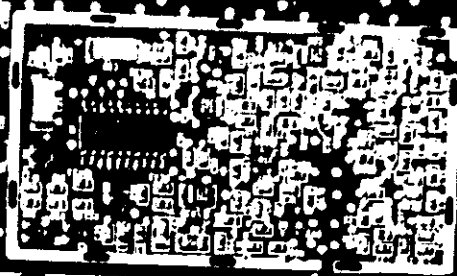
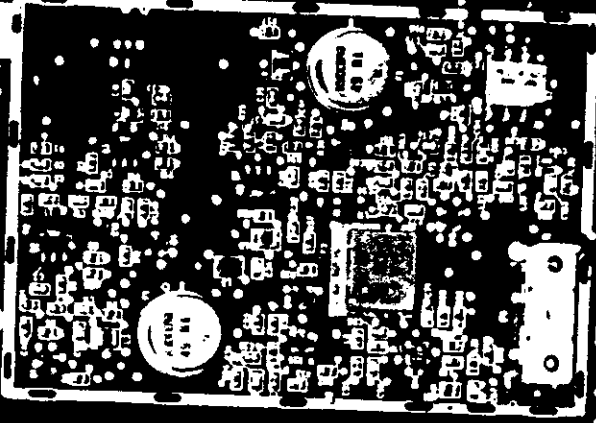
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PCBA: 25-1130 REV 07

6373



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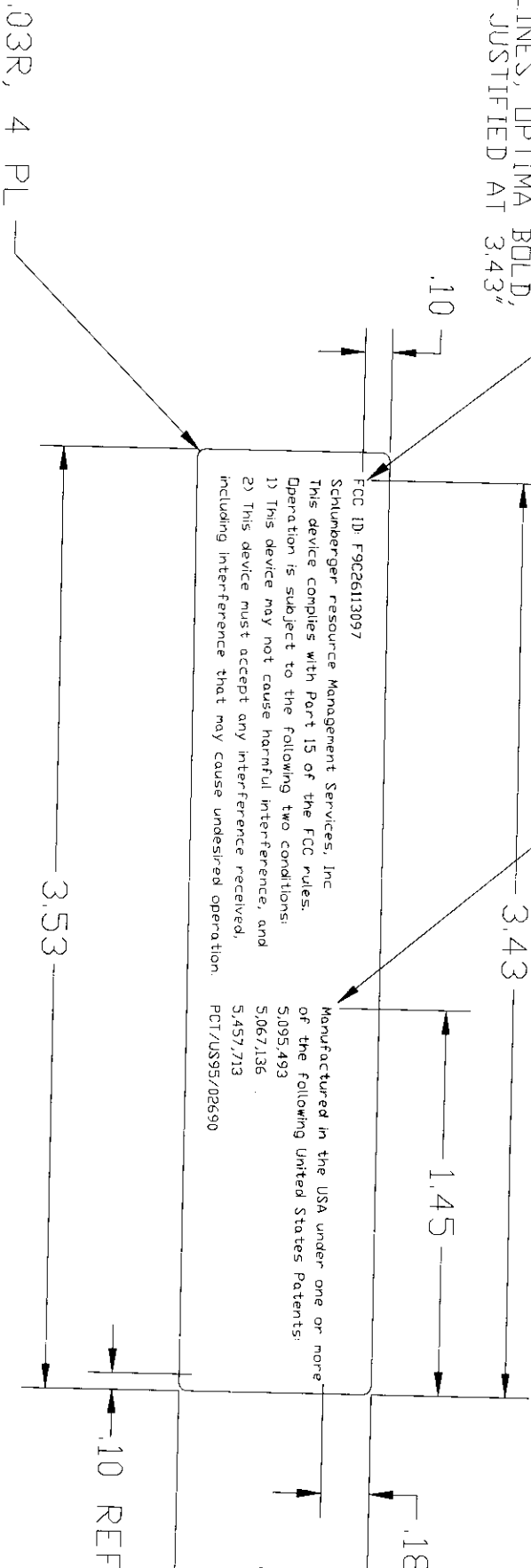
TEXT AREA: .050" HIGH TEXT,
.03" BETWEEN LINES, OPTIMA BOLD,
LEFT JUSTIFIED AT 1.45"

TEXT AREA: .050" HIGH TEXT,
.03" BETWEEN LINES, OPTIMA BOLD,
LEFT JUSTIFIED AT 3.43"

FCC ID: F9C26113097
Schlumberger resource Management Services, Inc
This device complies with Part 15 of the FCC rules.
Operation is subject to the following two conditions:
1) This device may not cause harmful interference, and
2) This device must accept any interference received,
including interference that may cause undesired operation.

Manufactured in the USA under one or more
of the following United States Patents:
5,095,493
5,067,136
5,457,713
PCT/US95/02690

REVISIONS			
REV	ZONE	DESCRIPTION	DATE
01		INITIAL RELEASE	9/97
A		MFG RELEASE PER ECD# 1079	3/99
B		REVISED PER ECD#	12/00



NOTES:

1. MATERIAL: .002" THICK WHITE POLYESTER WITH 3M #400 TYPE ADHESIVE, 3M# 7921 OR EQUIVALENT WITH PROTECTIVE BACKING.
2. TOP PRINT BLACK TEXT AND GREY#D179 BACKGROUND.
3. MATERIAL: LAMINATE .001" MATTE CLEAR POLYESTER, 3M #7732FL, OR EQUIVALENT, TO FACE OF LABEL
4. ANY NON SPECIFIED MATERIAL MUST BE APPROVED IN ADVANCE, IN WRITING, BY CELLNET ENGINEERING.
5. COLOR MATCH GREY TO CHIP SUPPLIED BY CELLNET.

4

3

2

UNLESS OTHERWISE SPECIFIED DIMENSIONS ARE IN INCHES TOLERANCES ARE: FRACTIONS DECIMALS ANGLES ± .XX ± .001 ± .05° XXX ± .0005		CONTRACT NO.	
MATERIAL SEE NOTE 1, NOTE 2, NOTE 3		APPROVALS	DATE
FINISH MATTE SIDE SHOWN		DESIGNED LB	9/97
CHECKED			
DID NOT SCALE DRAWING		125 SHOREWAY ROAD SAN CARLOS, CA 94070 TEL: (650) 508-6000	
SCALE 2/1		23-1138	
231138B.DWG		SHEET 1 OF 1	

LABEL, LAN FCC