

WILKINSON ) BARKER ) KNAUER ) LLP

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JEFFREY COHEN  
202 383-3369  
jcohen@wbklaw.com

December 15, 2000

By Federal Express and Electronic Submission

Mr. Errol Chang  
Ms. Jaunice Green  
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-CMM2200  
Reference Nos.: 16597, 16595 and 16824.

Dear Mr. Chang and Ms. Green:

We are writing in response to your request for further information concerning an application to transfer the FCC Identification number of device F9C-CMM2200. 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 16, 2000, we received two e-mail correspondences from Ms. Green requesting further information regarding F9C-CMM2200. Specifically, Ms. Green requested that we submit an application (Form 731), an exhibit containing the information required by section 2.933(a), and an exhibit containing information required by 2.929(d). In response to Ms. Green's requests and after further discussion with Mr. Fabina, we now provide additional information

Mr. Chang  
Ms. Green  
December 15, 2000  
Page 2

pursuant to section 2.933 of the Commission's rules. Since there is no change in design, circuitry or construction involved in the pending application to change the FCC Identifier for device F9C-CMM2200, we are submitting an exhibit with related attachments providing the information required by section 2.933(b). Beyond this exhibit, we also enclose a copy of an external photograph of 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 the e-mails sent requesting further information. We are also submitting all of the above materials and a copy of this letter electronically.

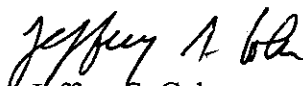
Regarding section 2.933(b)(5), referencing the photographs required by section 2.1033(b)(7), as we mentioned above, we are providing the photographs of the exterior appearance, and we are endeavoring to obtain a sketch of the new label to be used in future production. We will provide this information as soon as it becomes available.

With respect to Ms. Green's request for further information pursuant to section 2.292(d), as discussed above, the assets of the existing grantee CellNet, including its equipment authorization for this device, have been purchased by Applicant. The Applicant's mailing address is: 1600 Alabama Highway 229, Tallassee, AL, 36078.

In addition to also requesting the submission of an external photograph of the device, Mr. Chang has requested the submission of a copy of an RF evaluation pursuant to section 15.247(b)(4) of the Commission's rules. However, section 1.1307(b)(1), 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

  
By: Jeffrey S. Cohen  
Zachary A. Zehner\*

\* Practice limited to matters and proceedings before federal courts and agencies.  
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-CMM2200.

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

July 21, 1998 and October 29, 1999. See attachment for copies of original equipment authorizations.

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:** Friday, October 27, 2000 4:30 PM  
**To:** jcohen@wbklaw.com  
**Subject:** Information requested

**To:** Jeffrey Cohen, Wilkinson Barker Knauer, LLP  
**From:** Errol Chang  
echang@fcc.gov  
FCC Application Processing Branch

**Re:** FCC ID F9CCMM2200  
**Applicant:** Schlumberger Resource  
Management Services Inc.  
**Correspondence Reference Number:** 16824  
**731 Confirmation Number:** EA98807

1. External photograph of the equipment
2. Show that equipment will comply with section 15.247(b)(4) of the rules.

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](http://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.

## Constantine, Jason

---

From: oetech@fccsun07w.fcc.gov  
Sent: Monday, October 16, 2000 12:30 PM  
To: jcohen@wbklaw.com

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP  
From: Jaunice Green  
jygreen@fcc.gov  
FCC Application Processing Branch

Re: FCC ID F9CCMM2200  
Applicant: Schlumberger Resource  
Management Services Inc.  
Correspondence Reference Number: 16595  
731 Confirmation Number: EA98807

Change of Identification, refer 98800

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](http://www.fcc.gov), Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, 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.

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**From:** oetech@fccsun07w.fcc.gov  
**Sent:** Monday, October 16, 2000 12:30 PM  
**To:** jcohen@wbklaw.com

**To:** Jeffrey Cohen, Wilkinson Barker Knauer, LLP  
**From:** Jaunice Green  
jygreen@fcc.gov  
FCC Application Processing Branch

**Re:** FCC ID F9CCMM2200  
**Applicant:** Schlumberger Resource  
Management Services Inc.  
**Correspondence Reference Number:** 16597  
**731 Confirmation Number:** EA98807

Change of Identification, refer 98786

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](http://www.fcc.gov), Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, 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](mailto:btaube@fcc.gov) for correction rather than submitting a second 731 or 159.

Form 731 Confirmation Number:	EA98807
FCC ID:	F9CCMM2200
Date of Submission:	Sep 20 2000 4:55PM
<b>Press this button to begin document submission process.</b>	<b>Press this button to go directly to FCC Remittance Form (Form 159).</b>
Proceed to Exhibits Form	Proceed to Fee Form (159)

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*Mail your comments or suggestions (To: [btaube@fcc.gov](mailto: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 obtaining FCC Form 159, must currently be submitted in paper form along with payment to the address indicated in the FCC Fee 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:** f9c \* **Equipment Product Code (14 characters maximum):** cmm2200

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

First Name: Jim

Mail

Last Name: Brennan

Telep

Title:

Fax N

E-mail:

**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

202-78:

First Name:

Middle Initial:

Last Name:

Jeffrey

S

Cohen



<b>Address Line 1:</b> 2300 N Street, NW, Suite 700	<b>P.O.Box:</b> _____
<b>Address Line 2:</b> _____	<b>City:</b> Washington
<b>Country(if foreign address):</b> _____	<b>Zip/Postal Code:</b> 20037-1128
<b>E-mail:</b> jcohen@wbklaw.com	

**Item 8. \* Does this application include a request for confidentiality for any portion(s) of the data contained in this application pursuant to 47 CFR § 0.459 of the Commission Rules? If "Yes" see instructions.** ☐ Yes ☒

**Item 9. \* Does the applicant request that the Commission defer grant of this application pursuant 47 CFR § 0.457(d)(1)(ii)? (See instructions)** ☐ Yes ☒

If so, specify date when grant may be issued (MM/DD/YYYY format): \_\_\_\_\_

<b>Item 10. Equipment Code:</b> DSS -Part 15 Spread Spectrum Transmitter	<b>* Description of Product as it is Marketed:</b> Machine Quantity Usage Transmitter
---	--

**\* Equipment will be operated under FCC Rule Part(s):**  
 15

**Item 11. \* Application is for:**

☐ Original Equipment (See instructions)

☒ Change in identification of presently authorized equipment: Original FCC ID: h6ncmm2200 | Grant Date: \_\_\_\_\_

☐ Class II permissive change or modification of presently authorized equipment (See instructions)

**Item 12. EQUIPMENT SPECIFICATIONS: (See instructions)**

Frequency range in MHz	Rated RF power output in watts	Frequency tolerance	Em (See 47 C
917.58   917.58	.631	_____	
_____   _____	_____	_____	
_____   _____	_____	_____	
_____   _____	_____	_____	
_____   _____	_____	_____	
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_____   _____	_____	_____	
_____   _____	_____	_____	
_____   _____	_____	_____	

**Item 13. Is the equipment in this application:**

**\* (a) a composite device subject to an additional equipment authorization?** ☐ Yes ☒

**\* (b) part of a system that operates with, or is marketed with, another device that requires an equipment authorization?** ☐ Yes ☒

*If either of the above questions is answered "Yes" complete section 13(c).*

**(c) The related application:**

☐ has been filed at same time as this application under the FCC ID listed to the right

☐ has been granted under the FCC ID listed to the right

☐ is in the process of being filed under the FCC ID listed to the right

☐ is pending with the FCC under the FCC ID listed to the right

**Item 14. Name of test firm and contact person on file with the FCC, if different from applicant or contact person:**

**Firm Name:**  
 \_\_\_\_\_

First Name: \_\_\_\_\_ Last Name: \_\_\_\_\_  
Telephone: \_\_\_\_\_ Ext: \_\_\_\_\_ Fax No: \_\_\_\_\_ E-mail: \_\_\_\_\_

**Read each certification carefully before answering and signing this**  
**WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IM**  
**SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTITUTION PE**  
**312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).**

**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 ber 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862 because of a conviction for possession or distribution of a contr 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 tr IN accepting a Grant of Equipment Authorization issued by the FCC as a result of the representations made in this appli equipment with the exact FCC ID specified in this application, (2) compliance statement labeling pursuant to the applical applicable technical rules. If the applicant is not the actual manufacturer of the equipment, appropriate arrangements ha production units of this equipment will continue to comply with the FCC's technical requirements.

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

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

\* Signature of Authorized Person Filing:

Ben Lyon

Title of auth

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/Pc

E-mail: \_\_\_\_\_

**NOTE: An asterisk '\*' preceding a field indicates it must be completed before this applic:**

Continue

Clear

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*Mail your comments or suggestions (To: [btaube@fcc.gov](mailto:btaube@fcc.gov))*

*FCC - Federal Communications Commission - FCC\_731*

STAMP AND RETURN

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING (1) LOCKBOX #358315		FEDERAL COMMUNICATIONS COMMISSION <b>REMITTANCE ADVICE</b> PAGE NO. _____ OF _____ FCC/MELLON		APPROVED BY OMB 3060-058 AUG 3 1999 DO NOT USE	
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 Talladega				(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 (Continuation)					
(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 00012  
540

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

Date of Grant: 07/21/1998

San Carlos, CA 94070

Application Dated: 03/04/1998

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

H6NCMM2200  
CellNet Data Systems

Equipment Class: Part 15 Spread Spectrum  
Transmitter

Notes: Machine Quantity Usage  
Transmitter

<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>
	15	917.58 - 917.58	0.631	%	

This device must be installed by CellNet Data Systems personnel.

Mail To:

9803168315012001

COPY

FEDERAL COMMUNICATIONS  
COMMISSION  
WASHINGTON, D.C. 20554

COPY

GRANT OF EQUIPMENT  
AUTHORIZATION  
Certification

CellNet Data Systems  
125 Shoreway Road

Date of Grant: 10/29/1999

San Carlos, CA 94070

Application Dated: 09/21/1999

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

H6NCMM2200  
CellNet Data Systems

Equipment Class: Part 15 Spread Spectrum  
Transmitter

Notes: Machine Quantity Usage  
Transmitter

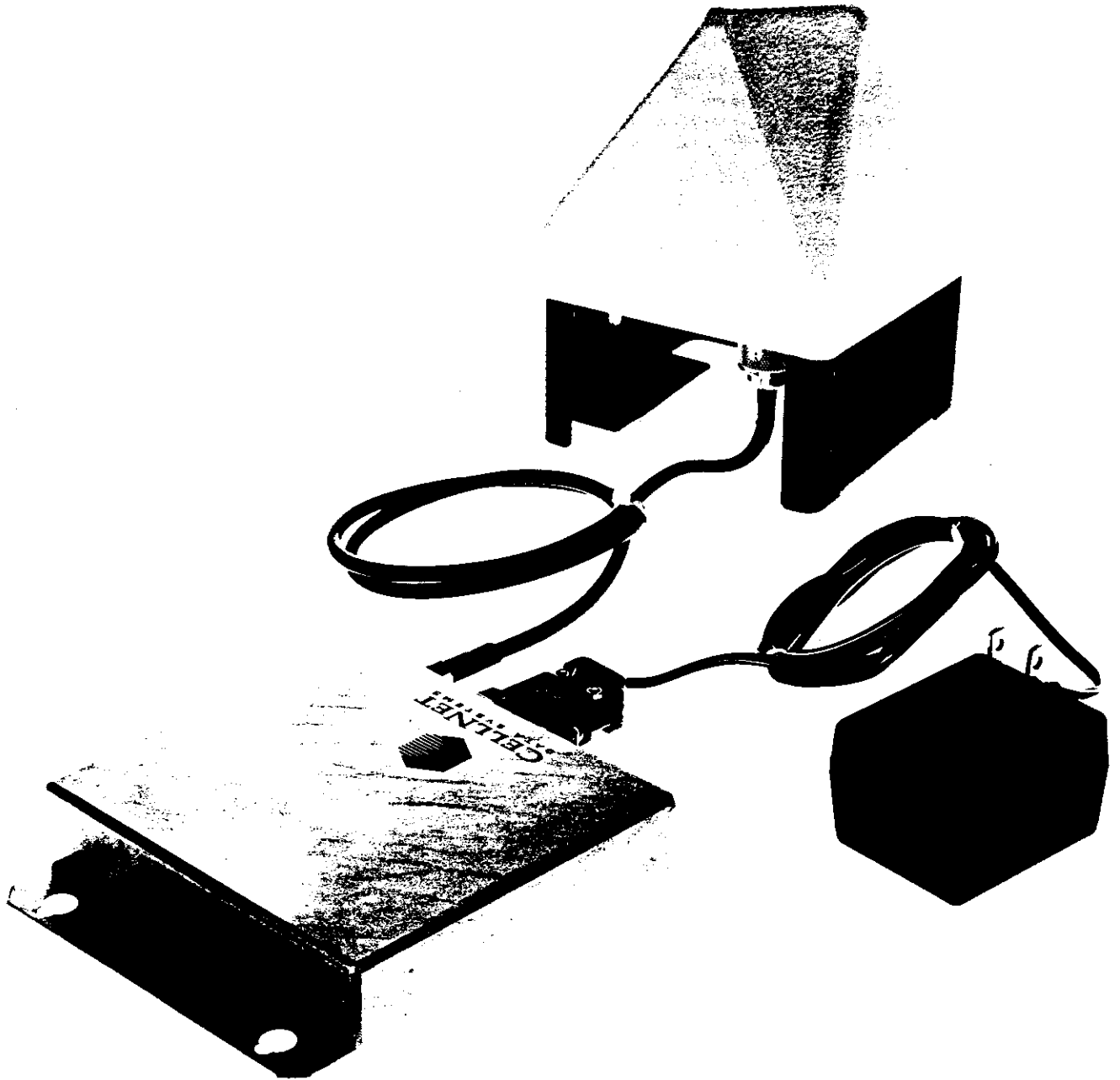
<u>Grant Notes</u>	<u>FCC Rule Parts</u>	<u>Frequency Range (MHZ)</u>	<u>Output Watts</u>	<u>Frequency Tolerance</u>	<u>Emission Designator</u>
	15	917.58 - 917.58	0.631	PM	

This device must be installed by CellNet Data Systems personnel.

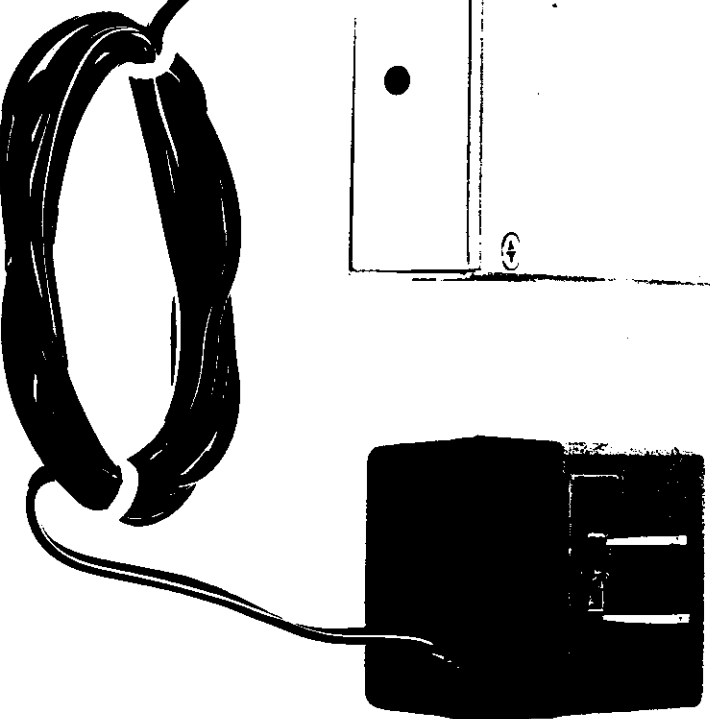
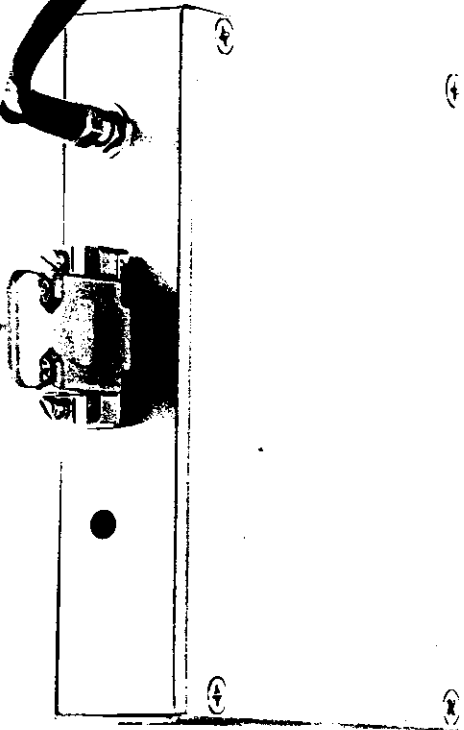
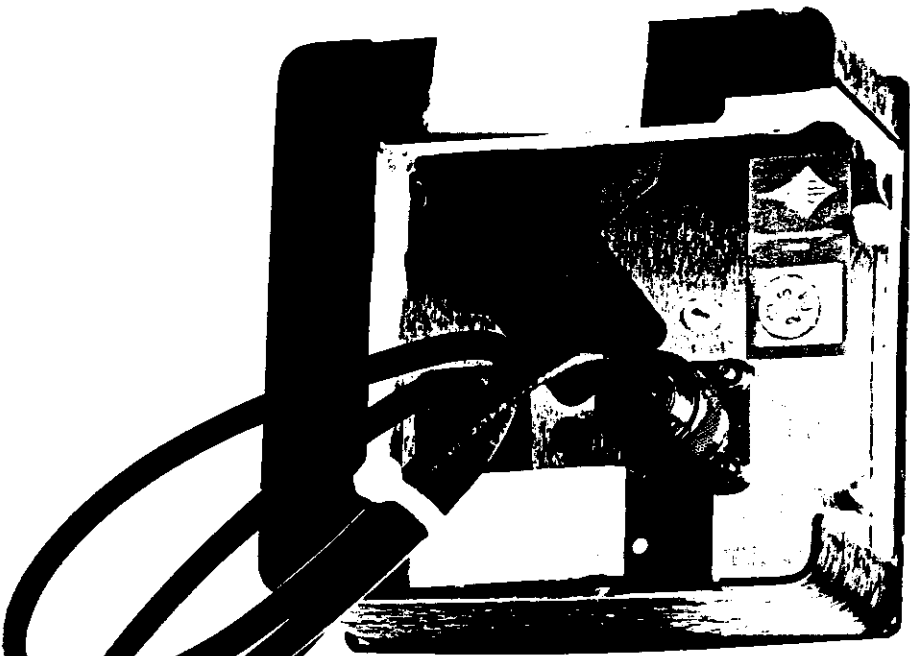
Mail To:

Doug Gronberg, Project Leader  
CellNet Data Systems  
125 Shoreway Road  
San Carlos, CA 94070

EA95452



Cellnet Data Systems  
FCC ID: H6NCMM2200  
Full System - Top View



Cellnet Data Systems  
FCC ID: H6NCMM2200  
Full System - Bottom View