

FISH & RICHARDSON P.C.

Frederick P. Fish
1855-1930

W.K. Richardson
1859-1951

601 Thirteenth Street N.W.
Washington, DC 20005

April 16, 1999

Mr. Joe Dichoso
FCC Laboratories
7435 Oakland Mills Road
Columbia, MD 21046

Telephone
202 783-5070

Facsimile
202 783-2331

Web Site
www.fr.com

Re: Change in Identification filing
Union Switch & Signal

Original FCC ID: G3V6MXDUALANTENNA
New FCC ID: J8C6MXDUALANTENNA

Dear Joe:

On behalf of Union Switch & Signal, this is to respond to your e-mail of February 19, 1999, (attached) and your telephone conversation with David Munson yesterday, concerning the above-referenced Change in Identification application.

The original authorization grant for this device was effective April 26, 1998, meaning the device was tested under the pre-1989 Part 15 rule amendments. Accordingly, Rich Fabina requested Union Switch to re-test the device and submit the data and materials required in a full certification application. These materials are enclosed.

You will note that the open area test configuration selected for the device (see Section 4.2) had the device's antenna facing downward. This represents the true orientation of the antenna which at all times will be mounted on the underside of the train pointing towards the ground. The ANSI C63.4 test procedures allow such an orientation based on "typical usage". See ANSI C63.4 §§6.2, 6.2.2 and 13.0. In addition, you will note that Retlif computed the actual extrapolation factor (63.4 dB/decade) for the device pursuant to Section 15.31 (f)(2) of the rules, rather than rely on the default value given in that section. Please contact me immediately if you have any questions or concerns with either of these test procedures.

On a separate matter, per your conversation with David we have sent an e-mail (attached) to Richard Fabina requesting an extension of time to address the Change in Identification application for FCC ID: J8C2Z2TRANSPOUNDER which was originally submitted with the above-referenced application.

FISH & RICHARDSON P.C.

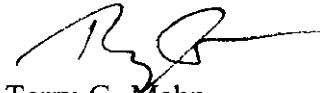
April 16, 1999

Page 2

Re-testing was not required for that device because its authorization note code indicates that it was tested under the 1989 Part 15 Rule amendments. Union Switch is still searching its archived documents for the original schematics which you requested and it will provide these in due course.

Please contact us if you have any questions or comments.

Very truly yours,



Terry G. Mahn

Encl.

cc: Union Switch & Signal

97314.W11

Author: DXM at FR-DC
Date: 04/15/1999 2:42 pm
Priority: Normal
TO: rfabina@fcc.gov at Internet
CC: clwebber@switch.com at Internet, TGM, DXM
Subject: Re: Change in Identification app.: JC82Z2TRANSPOUNDER

Dear Rich:

This is to follow-up the e-mail (below) regarding a "Change in Identification" application submitted by Union Switch & Signal for FCC ID: JC82Z2TRANSPOUNDER. Specifically, we request a brief extension of time (until May 1) to supply the additional materials requested.

As you will recall, this device was granted an equipment authorization effective 11/13/1989 (and the grant contains a notocode which indicates that it complies with the revised (1989) rules); however, neither the FCC Laboratories nor Union Switch has a copy of the original certification application on file. You indicated to Terry Mahn that it will not be necessary to retest the device; rather, it will only be necessary to provide the materials required in an "abbreviated" certification application (which are essentially the same materials required in a standard certification submission, except for a test report).

I spoke with Joe Dichoso about this matter and he requested that I send our extension request to you for forwarding to him (so he could refresh his memory and assure his understanding of your arrangement with Terry).

Please note that this request stems from the fact that we are still sorting through archived files for the original device schematics (which has required us to deal with the company from which the device was purchased). In addition, a companion device for which a "Change in Identification" was also sought (FCC ID: J8C6MXDUALANTENNA) has required special attention, as this device was required to be retested.

Please contact us if you have any questions or comments.

Very truly yours,

David Munson
Law Clerk

Fish & Richardson P.C.
601 13th Street, NW
Washington, DC 20005

tel: (202) 783-5070
fax: (202) 783-2331
e-mail: munson@fr.com

Reply Separator

Subject: FW: tx
Author: "Webber, Carrie L" <clwebber@switch.com> at Internet
Date: 02/19/1999 11:16 am

> -----Original Message-----
> From: oetech@fccsun07w.fcc.gov [SMTP:oetech@fccsun07w.fcc.gov]
> Sent: Friday, February 19, 1999 11:08 AM
> To: clwebber@switch.com
> Subject: tx
>
> To: Carrie Webber, null
> From: Joe Dichoso
> jdichoso@fcc.gov
> FCC Application Processing Branch
>
> Re: FCC ID J8C2Z2TRANSPOUNDER
> Applicant: Union Switch & Signal Inc
> Correspondence Reference Number: 6209
> 731 Confirmation Number: EA92702
> Date of Original E-Mail: 02/19/1999
>
>
> We no longer have records of the device that you are applying for.
> Therefore, please submit information that is required with a new
> application. The information needed is listed in Section 2.1033. This
> includes photo's of the device, schematics, test report, users manual and
> a description of the device.
>
> 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

Approved by OMB
3060-0057

FCC FORM 731

APPLICATION FOR EQUIPMENT AUTHORIZATION

For
FCC
use
only

SECTION I - ALL ITEMS IN THIS SECTION MUST BE COMPLETED

1. Applicant's complete, legal business name

Union Switch & Signal Inc

 Check here if this is a change in
name and/or address not previously
reported (See 47 CFR §2.934)

2. Applicant's mailing address (Line 1)

645 Russel Street

Bureau Use Only

Equipment Code:

Applicant's mailing address (Line 2) (if required)

Engineer:

City

Examiner:

Batesburg

State or Country (if foreign address)

South Carolina

ZIP/Postal Code

29006

3. FCC ID:

(a) Grantee Code

(b) Equipment Product Code

(14 characters maximum, show zeros as 0)

J 8 C

6MXDUALANTENNA

4. Name, Title and Mail Stop, if any, of person at the applicant's address to receive grant, or for contact: (See instructions)

Joseph W. Schaad

5.(a) Telephone No. (Area/Country/City code, No. and Ext.)

412-688-2005

(b) FAX No. (Area/Country/City code and No.)

412-688-2398

(c) Internet e-mail address: jwschaad@switch.com

SECTION II - See 47 CFR §1.1103 for Fee Type Codes and Fees. Fee Type Codes are listed in Paragraph C of the attached instructions.

Enter in Column (A) the correct Fee Type Code for the service for which you are applying. Enter in Column (C) the result obtained from multiplying the Fee amount for the Fee Type Code in Column (A) by the number entered in Column (B). If requesting more than ONE service, enter additional Fee Type Code(s) in Section III below.

(A)

(B)

(C)

FEE TYPE CODE		
E	G	C

FEE MULTIPLE			
0	0	0	1

FEE DUE FOR FEE TYPE CODE IN COLUMN (A)	
\$	940.00

FOR FCC USE ONLY

SECTION III - Use when requesting more than one service. If only one service is requested, complete only Section II and Section III, Item (5).

(A)

(B)

(C)

FOR FCC USE ONLY

0	0	0	1
---	---	---	---

\$	
\$	

0	0	0	1
---	---	---	---

\$	
\$	

0	0	0	1
---	---	---	---

\$	
\$	

Add all amounts shown in column C, lines (1) through (4), and enter the total here.
 This amount should equal your enclosed remittance.

TOTAL AMOUNT REMITTED WITH THIS APPLICATION OR FILING	
\$	940.00

FOR FCC USE ONLY

SECTION IV - Enter FCC ID from Page 1, Section I

► J8C6MXDUALANTENNA

1.(a) Instead of Applicant, FCC is authorized to mail original Grant to: (See instructions)

Firm name,
number, street,
City, State/Country,

ZIP/Postal Code

Retlif Testing Laboratories

795 Marconi Avenue

Ronkonkoma, NY 11779

(b) Name, Title and Mail Stop, if any, of person at above address to receive Grant: (If 1.(a) is completed, this item must be completed)

Richard J. Reitz, Laboratory Manager

2.(a) Technical contact:

Firm name,
contact person,
number, street,
City, State/Country,
ZIP/Postal Code

Retlif Testing Laboratories

Thomas J. Schneider

795 Marconi Avenue

Ronkonkoma, NY 11779

(b) Telephone No. (Area/Country/City code, No. and Ext.)

(516) 737-1500

(c) FAX No. (Area/Country/City code and No.)

(516) 737-1497

(d) Internet e-mail address: rreitz@retilf.com

(e) Non-Technical contact: Retlif Testing Laboratories

Firm name,
contact person,
number, street,
City, State/Country,
ZIP/Postal Code

Michelle Tirado

795 Marconi Avenue

Ronkonkoma, NY 11779

(f) Telephone No. (Area/Country/City code, No. and Ext.)

(516) 737-1500

(g) FAX No. (Area/Country/City code and No.)

(516) 737-1497

(h) Internet e-mail address: n/a

3. 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's Rules? If "Yes" see instructions.

 Yes No

4. Does the applicant request that the Commission defer grant of this application pursuant to 47 CFR §0.457(d)(1)(ii)? (See instructions)

 Yes No

5. Type of equipment authorization requested: (check one box only)

 Certification Type Acceptance Notification

6.(a) Equipment Code and description: (See instructions, page 4)

 D C D

Low Power Transmitter below 1705 kHz

(b) Equipment will be operated under FCC Rule Part(s):

15.209

7. Application is for: (Check one box only)

 1. Original equipment
(See instructions) 2. Change in identification of presently authorized equipment 3. Class II permissive change or modification of presently authorized equipment
(See instructions)

ORIGINAL FCC ID

Grant date

8. EQUIPMENT SPECIFICATIONS: (See instructions)

(a) Frequency range in MHz	(b) Rated RF power output in watts	(c) Frequency tolerance %, Hz, ppm	(d) Emission designator (See 47 CFR §2.201 and §2.202)	(e) Microprocessor model number
200 kHz	0.75 uV/M Peak @ 300M	N/A	N/A	N/A

9. Is the equipment in this application:

(a) a composite device subject to more than one type of equipment authorization?

 Yes No

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

 Yes No

If either of the above questions is answered "Yes" complete items 10.(a) and (b). (See instructions)

SECTION IV (continued) - Enter FCC ID from Page 1, Section I ► J89C6MXDUALANTENNA10.(a) Additional type of equipment authorization required: Certification Type Acceptance Notification

(b) The related application checked in item 10.(a) (Check one box only)

has been filed at the same time as this application has been granted under the FCC ID listed below is in the process of being filed under the FCC ID listed below is pending with the FCC under the FCC ID listed below

G3V2Z2TRANSPOUNDER**FCC ID**

11.(a) Name of test firm on file with the FCC, if different from applicant or contact person:

Retlif Testing Laboratories

(b) Mailing address, number, street, City, State/Country, ZIP/Postal Code	795 Marconi Avenue Ronkonkoma, NY 11779	(c) Telephone No. (Area/Country/City code, No. and Ext.) (516) 737-1500
		(d) FAX No. (Area/Country/City code and No.) (516) 737-1497

(e) Internet e-mail address: www.retlif.com

12. Number of exhibits submitted with this application: 7

SECTION V - Read each certification carefully before answering and signing this application.

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND/OR IMPRISONMENT (U.S. CODE, TITLE 18, SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTRUCTION PERMIT (U.S. CODE, TITLE 47, SECTION 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

1. 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 benefits, that include FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. §862 because of a conviction for possession or distribution of a controlled substance. See 47 CFR 1.2002(b) for the definition of a "party" for these purposes.

Does the applicant or authorized agent so certify? Yes No**2.(a) 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 in this application, the applicant is responsible for (1) labeling the equipment with the exact FCC ID specified in this application, (2) compliance statement labeling pursuant to the applicable rules, and (3) compliance of the equipment with the applicable technical rules. If the applicant is not the actual manufacturer of the equipment, appropriate arrangements have been made with the manufacturer to ensure that 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 responsible for all statements in this application.

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



Original written signature of authorized signer

▲ Date (Month, Day, Year)

▲ Typed/printed name of authorized signer

▲ Title of authorized signer

▼ Complete items below if an agent signs the application.

(b) Agent's business name,
number, street,
City, State/Country,
ZIP/Postal Code

(c) Telephone No. (Area/Country/City code, No. and Ext.)

(d) FAX No. (Area/Country/City code and No.)

(e) Internet e-mail address: