

To FCC Reviewing Engineer:

A question has arisen as to the applicable rule sections for certain emissions from the UWB transmitter FCC ID:NUF-2000SGT-0702. Based on discussions, the emissions in question have a frequency of approximately 1228 and 1536 MHz. These emissions are related to operation of the digital circuits within the unit. As such they are not to be considered as intentional UWB emissions and are not radiated by the antenna of the UWB transmitter pursuant to Section 15.521(c).

Section 15.231 (c) states the following: "If it can be clearly demonstrated that an emission from a UWB transmitter is due solely to emissions from digital circuitry contained within the transmitter and that the emission is not intended to be radiated from the transmitter's antenna, the limits shown in Section 15.209 of this chapter shall apply to that emission rather than the limits specified in this section." Accordingly the correct limit to apply to the 1228 and 1536 MHz frequencies is the limit Specified in Section 15.209.

Please refer to Section 5.3 of the submitted test report. This section describes the technique used to determine the appropriate classification of the emission radiated from the transmitter. Based on this technique, the above frequencies are subject to a limit of 500 uV/m measured at 3 meters using an average detector with a 1 MHz resolution bandwidth.

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