

February 26, 2003

Mr. Joe Dichoso (jdichoso@fcc.gov)
Senior Engineer, FCC Application Processing Branch
FCC Laboratory
Columbia, MD

Re: **FCC ID NUF-RV2000-1202**

Applicant: **Time Domain Corporation**

Correspondence Reference Number: **24829**

731 Confirmation Number: **EA398281**

Dear Joe:

Below are your eleven numbered comments and our response. Should you have any questions, please call me (256) 428-6317.

1). Justify the confidentiality request for the internal photos. Confidentiality of the internal photos cannot be granted if the device is sold to the general public. Will you sell the device only to parties that have confidentiality agreement with Time Domain?

TDC Response: This device cannot be sold to the general public, it can only be sold to law enforcement and fire fighting/emergency rescue entities eligible for licensing on the public safety pool frequencies as set forth in Part 90 of the commission's rules. In addition every customer must sign a terms and condition sheet that I have attached to this correspondence.

2) Section 3.2 of the Test report indicates that average measurements above 960 Mhz were made with 1 MHz RBW and 10 kHz VBW. Please make measurements with RMS detector per Section 15.521(d).

TDC Response: This Device was designed and built to comply with the rules and measurement techniques in the waiver. We used the video filtering method as it was called out in the waiver. Therefore Section 15.521 does not apply for this filing.

3) Table 3.3.1 lists Antenna factors in dB(1/m) while tests were performed at 3 meters. Please correct/explain.

TDC Response: The Antenna factor is expressed in units of dB per meter (a.k.a. dB (1/m) or dB/m). Measurements that were made at three meters were made using three-meter antenna factors.

4) Table 3.3.2 lists Antenna factors in dB(1/m) and tests were performed 1 meter. This table does not list a distance factor while tests were performed at 1 meter. Above 1 GHz, and RMS detector must be used. Please correct/explain accordingly.

TDC Response: The measurements that were made at one meter were made using one-meter antenna factors. The limit was adjusted to correspond to a one-meter measurement distance. At three meters, the limit is 54. At one meter, the limit is 63.5 (calculated by using the inverse square law). Since the limit was adjusted to the one-meter distance, further correction using the distance factor was unnecessary. The video filtering method was used for above 1 GHz as it was called out in the waiver.

5) Test data in Table 3.3.3 listed measurements at 1 meter however; no distance correction factor was listed. Please correct/explain.

Please explain limit. The peak limit is 0 dB EIRP. Provide compliance with this requirement.

TDC Response: The measurements that were made at one meter were made using one-meter antenna factors. The limit was adjusted to correspond to a one-meter measurement distance. At three meters, the limit is 54. At one meter, the limit is 63.5 (calculated by using the inverse square law). Since the limit was adjusted to the one-meter distance, further correction using the distance factor was unnecessary.

The 0 dB EIRP applies to devices filed under First Report and Order this device should be filed under the waiver were this limit does not apply.

6) Provide a copy of the waiver or indicate status of waiver request.

TDC Response: You will find filed along with this correspondence a copy of the waiver.

7) Indicate F_l , F_m (the frequencies of the UWB bandwidth) and F_h (Frequency of highest field strength). For F_h , indicate the level and indicate compliance with the 0 dB EIRP limit. Indicate test procedure used to determine compliance.

TDC Response: This method applies to devices filed under the First Report and Order. Our device should be filed under the waiver were this limit does not apply.

8) Provide measurement data showing compliance with 15.517(c) measurements above 960 MHz with RMS detector and RBW of 1 MHz.

TDC Response: This Device was designed and built to comply with the rules and measurement techniques in the waiver and should be filed under this waiver. Therefore Section 15.517(c) does not apply for this filing.

9) Provide measurement data showing compliance with 15.517(d) measurements in the GPS bands with and RMS detector and RBW of 1kHz.

TDC Response: This Device was designed and built to comply with the rules and measurement techniques in the waiver and should be filed under this waiver. Therefore Section 15.517(d) does not apply for this filing.

10) Provide and exhibit showing compliance with the labeling requirements in Section 15.517(f).

TDC Response: This Device was designed and built to comply with the rules and measurement techniques in the waiver and should be filed under this waiver. Therefore Section 15.517(f) does not apply for this filing.

11) For all of the test data corrections and requests above please provide a complete and corrected test report.

TDC Response: ITS Atlanta did make some changes to the report to make things a little more clear and I will submit the revised report with this correspondence letter.

Feel free to contact me if any of these issues need to be discussed further.

Yours truly,
Keven Trach
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