



April 21, 1999

To: Federal Communications Commission
Correspondence ID: 6433

Applicant: Whisper Communications, Inc.
3200 Coronado Dr.
Santa Clara, CA 95054

FCC ID: NVCRM10005

Dear Mr. Joe Dichoso,

The following information is our response to your e-mail dated 3/10/99, ID: 6433:

- 1) See attached copy of the block diagram for Retrofit RMIs.
- 2) Please note that the output power was measured with 30 kHz RBW and 30KHz VBW at Rockford Engineering Services lab. For your information, We re-measured the conductive output power at RES lab, see attached copy.

The maximum peak output power of the RMIs is 160 mW (+22dBm) which is less than 1Watt requirements per section 15.247 (a)(i)

- 3) The internal antenna uses ½ loop, 6dBi gain maximum.
- 4) The retrofit RMI has output power of 160 mW which is less than 1-Watt requirement of Class C and is operating at 900 MHz frequency band. Therefore, the RF safety requirement is not applicable for this class of equipment.

Please refer to our previously FCC certified equipment (FCC ID: NVC RMI0002 and NVC RMI0006) which are identical to this Retrofit RMI device except for the layout and some minor modifications in the digital circuitry to accommodate the new mechanical dimensions. These certified devices are also operating at the same frequency band and the RF output power level. Note that per our phone conversation with MR. Richard Fabina dated December 17, 1998; the RF safety requirement does not apply for this class of equipment.

- 5) This equipment is for the industrial use and will be installed by professional service personnel in the field.
- 6) As I stated in my letter dated December 19, 1998 to Mr. Richard Fabina (see attached copy), We do not market these equipment as a stand-alone module. We may ship the modules to our customers without the meter housing in order to cut down the shipping cost. Our customers will install these modules into the meter housing in the field by a service technician.

Please note that these retrofit RMIs are designed to fit into any meter housing including GE, Westinghouse, Landis & Gyr, and Schlumberger. All these meter housings are electrically and mechanically identical to each other except for the rating of the disk revolution per watt-hour. For example, GE meters have 7.2 watt-hour per one complete disk revolution.

Sincerely,

Amir Ashtiani

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