

July 23, 2001

To: William Graff
From: Brian Dettling
Subj: Your comments of 7/20/2001
RE: M/A Comm Private Radio Systems
FCC ID: OWDTR-197-A2

From Bryan McWatters, M/A COM Private Radio Systems:

Question 1. The modulation is identical to the previous system: it is 2-level FM fsk.

Question 2. The OWDTR-197-A2 was modified in Feb. of 2000 and approved with respect to 90.203(j)(3). As the filing is no longer available on the FCC site, I have attached the exhibit 6 (test report) and exhibit 13 (cover letter) for ATCB to review.

Please see the attached PDFs labeled as referenced above.

Thank you,

Brian J. Dettling
Washington Laboratories, Ltd.

July 20, 2001

RE: M/A Comm Private Radio Systems

FCC ID: OWDTR-197-A2

This is in reference to your memo of 07/20/01

1.) The SitePro Controller appears to be a "new" baseband modulation scheme being retrofitted into a mature rack mount base station system. It is not sufficient to simply say it is the same as the old system without proving it. Please provide some sort of operational description describing the modulating intelligence.

2.) Please refer to the specifications section of Section 1.0 on pp.7 of the manual. It is my understanding that even for Class II Permissive Changes, VHF and UHF equipment authorized under Part 90 after 02/14/1997 must meet the data efficiency standards of 90.203(j)(3). The manual appears to state that only 4800bps is available for 12.5KHz channels, and 9600bps for 25KHz channels. Please respond.