

Federal Communications Commission  
Equipment Authorization Division  
Columbia MD  
Attn: Andy Leimer

In reference to FCC ID: ZPRM3-VHF-136  
Applicant: JPS Communications, Inc.  
Correspondence Reference Number: 128301  
Form 731 Confirmation Number: TC134619

FCC: It appears that this application should have been processed using PBA procedures under Section 90.203(j)(4) but it was not. In addition, this device is not compliant with Section 90.203(j)(4). Please explain your action.

Timco: Yes, I appeared to have misread 90.203 and issued the grant based on the thought that it met the requirements for narrow band equipment by meeting the spectral efficiency requirements and being less than 25 kHz. Thank you for your concise analysis.

As to the upload of the integrated circuit data sheets it appears to have been a clerical error and I have attached the Operational Description as an exhibit.

The equipment does indeed meet the spectral efficiency requirements of 90.203 and the test report has been updated to include a plot that demonstrates this.

Sincerely,  
Mario de Aranzeta  
Engineer

The following is an analysis:

This is a multi-mode device with authorized BWs of 11.25 kHz for both digital and analog modes listed on the Grant (Plus other narrower FSK mode BWs) under Part 22 and 90. It also has the EF note code (136-174 MHz). This is a repeater station with Test Report data for 11.25 kHz authorized BW for both analog and digital modes. The User's Manual indicated P25 Net and paging operation as best as I can determine from the User's Manual. The Operational Description is unacceptable as they uploaded copies of chip data sheets. This device does not appear to be multi-bandwidth mode (multi-mode) as required in Section 90.203(j)(4)(iii).

Reference Material:

The Exclusion List (Published KDB 628591) states:

1) i) Transmitters operating under the provisions of Section 90.203(j)(4) with channel bandwidths of greater than or equal to 12.5 kHz operating in either multi-bandwidth modes or under the special provisions of spectrum efficiency standards specified in Section 90.203(j)(5), or operating under the provisions of one way paging channel standards of Section 90.203(j)(7).

The PBA List (Published KDB 388624) states:

C) 5) Transmitters operating under the special provisions of spectral efficiency (KDB 579009)  
(i) Section 90.203(j)(4) with channel bandwidths of greater than or equal to 12.5 kHz operating in either multi-bandwidth modes, or  
(ii) Section 90.203(j)(5) for special provisions of spectrum efficiency standards, or  
(iii) Section 90.203(j)(7) for one way paging channel standards, or  
(iv) Section 90.203(j)(8) for slower data rate where case-by-case consideration is necessary.