



June 18, 1999

Federal Communications Commission
Authorization & Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21406

Attention: Equipment Authorization Branch

Subject: Certification for FCC ID: AXATR-400-A2

Gentlemen,

Ericsson Inc. requests certification (type acceptance) for the AXATR-400-A2. This OEM module transceiver is designed as a mobile for use in the AMPS/DAMPS cellular telephone system operating in the 800 MHz Domestic Public Cellular Radiotelephone Communications Services per Subpart H of part 22. This OEM module meets the requirements of IS-137A for operation in cellular systems.

This OEM module is similar to previously type accepted FCC ID: AXATR-372-A2.

Ericsson requests an exclusion from routine RF exposure measurements based on the discussion presented in Exhibit 11, RF Exposure Evaluation, and communications with Kwok Chan on 5/18/99. The primary reason for this request is due to hardware limitations of our burst mode making MPE evaluation infeasible because the module does not have a normal operating mode that would support the duration of an RF exposure evaluation. Due to the inherent duty cycle properties of the burst modem mode, the resultant worst case *average* ERP is 1.27 Watts, which is below the 1.5-watt threshold for excludability. Furthermore, the analysis of the maximum RF exposures under worst-case and typical conditions clearly demonstrates compliance with the amended FCC rules. We have included specific instructions and warnings in Exhibit 8, OEM Interface Manual, regarding minimum separation distance, maximum antenna gain, and that use as a portable transmitter will require separate FCC approval for SAR compliance.

Ericsson Inc. requests confidentiality under 47 CFR 0.459 for the following exhibits listed:

Exhibit 4	Block Diagram
Exhibit 5	Schematic Diagrams

Justification of this request is that in order to facilitate the circuit miniaturization of the AXATR-400-A2, proprietary techniques were implemented in the transmitter, receiver, and baseband circuitry. To protect Ericsson's competitive advantage on these proprietary techniques, we request the above listed exhibits be held as confidential and withheld from the Public Information File.

Sincerely,

Jim Sponsler
Staff Engineer, Regulatory Services
Research Triangle Park, NC

Tel No: (919) 472-6460
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June 18, 1999

Federal Communications Commission
Equipment Approval Services
PO Box 358315
Pittsburgh, PA 15251-5315

Subject: Enclosed a check for Type Acceptance and Confidentiality follows:

FCC ID

FEE

AXATR-400-A2

\$ 580.00

Sincerely,

John Rothgeb
Specialist Regulatory Programs
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Enclosures: Check
 Filing for Equipment Approval Branch