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TAIYO MUSEN CO., LTD.

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September 26, 2006

Federal Communications Commission
Authorization and Evaluation Division
7435 Oakland Mills Road
Columbia, Maryland 21046

Subject : FCC type acceptance for VHF Automatic Digital Direction Finder, TD-L1630

FCC ID: BAA9JKTD-L1630
To whom it may concern :

This letter addresses the requirements of Part 15.121 that the VHF Automatic Digital Direction Finder, Model: TD-L1630 is incapable of operating (tuning), or readily being altered by the user to operate, within the frequency bands allocated to the Cellular Radiotelephone Service in Part 22 (cellular telephone bands).

Within the FCC requirement, it requests "a statement that assesses the vulnerability of the scanning receiver to possible modifications and describes the design features that prevent modification of the scanning receiver to receive Cellular transmissions". It also requests "a statement that describes the design steps taken to make tuning, control and filtering circuitry inaccessible".

In reply to both of the above requests, TAIYO MUSEN Co., LTD. designed the circuitry of TD-L1630 to meet the specification of TD-L1630, that is, receiving function and DF function are limited only in the frequency range between 110 MHz and 170 MHz. To use these PCBs outside of this frequency range, the construction of circuit board itself should be altered. Especially, PCBs which are related to the receiving function, circuit boards itself need to be reconstructed. Furthermore, receiving function of TD-L1630 is controlled by software in P-ROM. This software is programmed to meet the specification of TD-L1630, that is, the frequency range, 110 MHz - 170 MHz. If someone tries to use this model to receive other frequency outside of 110 - 170 MHz, the software of P-ROM is inevitably required to be re-programmed. That is, it is not possible for TD-L1630 to receive other frequency just by adding some parts, such as diodes and resistors.

For these 2 features, receiving function is controlled by software in P-ROM, exclusive construction of circuit board only for TD-L1630, it is not possible to use TD-L1630 to receive any frequency except for the frequency range declared specification, 110 MHz - 170 MHz.

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Additionally, the circuitry associated with the tuning, control, and filtering components were composed by using epoxy glue to fasten the shield over the receiver section in an attempt to make the units inaccessible to tuning and tampering. These procedures have been demonstrated to be an acceptable deterrent against possible modification that attempt to defeat the provisions mandated in FCC Part 15.121.

The test procedures and results of the 38 decibel image frequency rejection ratio are being provided with this submission. The accompanying documentation describes the test setup, the test procedures, and the test results. These results clearly demonstrate that the 38 decibel requirements for image rejection have been met.

Thank you for your consideration in this matter. We trust that the above details and the referenced exhibits will satisfy the requirements for this submission. Please contact me if you have any questions or require any additional information.

Best regards

TAIYO MUSEN CO., LTD.



Toru Noshiro
General Manager, Overseas Trading Dept.

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