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July 3, 2001

By Electronic Submission

Mr. Joe Dichoso
Federal Communications Commission
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21046

Re: *Schlumberger Resource Management Services, Inc.*
Response to Request for Further Information
FCC ID: F9CCMM1305
Reference No.: 19117

Dear Mr. Dichoso:

We are writing in response to your request for further information concerning an application we submitted on behalf of Schlumberger Resource Management Services, Inc. to transfer the FCC Identification number of device F9CCMM1305. On December 29, 2000, we electronically and manually filed a cover letter with accompanying attachments responding to the requests you made on October 30, 2000 via e-mail correspondence (Reference No. 16837). On January 23, 2001 we received e-mail correspondence (Reference No. 17803) requesting further information, including a showing of compliance with RF safety requirements. In response to this request, on January 31, 2001, we electronically and manually filed a cover letter and an RF Emissions Statement.

On May 4, 2001, we received e-mail correspondence from you requesting further information regarding F9CCMM1305 (Reference No. 19117). Specifically, you requested that we submit external photographs, internal photographs, and photographs of all applicable antennas of the device, an exhibit indicating how the device complies with RF safety requirements (due to the output power), including the provision of MPE calculations taking into account the ouput power, antenna gains, and the use of the device, and installation/ user instructions for the device.

In response to the May 4, 2001 requests, we are uploading into the External Photograph exhibit folder associated with the pending application in the Office of Engineering and Technology's ("OET") application database non-photocopy external photographs of the device and all applicable antennas. According to an instructional letter forwarded to us on May 3, 2001, by Mr. Richard Fabina, Chief, Equipment Authorizations Branch, only external photographs are required to change the FCC Identification number of equipment associated with a transfer of control transaction of the type involved in this case. Accordingly, no internal photographs are included.

As previously stated in our response on December 4, 2000, the location and positioning of the new FCC ID label, (the appearance of which was submitted in sketch form on December 4, 2000, pursuant to section 2.1033(b)(7) of the Commission's rules), will not change in future production of the device from the location or positioning of the old label.

With respect to your request for an exhibit indicating how the device complies with RF emissions requirements, section 1.1307(b)(1), which is referenced by section 15.247(b)(4), categorically excludes Applicant from the requirement to conduct a routine environmental evaluation for RF exposure for the subject device. The device, a Part 15 Spread Spectrum Transmitter, is not listed in subsection 1.1307(b)(1) Table 1 or in subsection 1.1307(b)(2), and therefore falls into the excluded category. Accordingly, the Commission's rules do not require the submission of an RF evaluation. As mentioned above, however, on January 31, 2001, we submitted an RF Emissions Statement in response to your January 23, 2001 request. To respond to your May 4, 2001 request, we are uploading this statement into the RF Exposure Info exhibit folder on the OET application database.

In addition, please note that the instant device is professionally installed and, as a result, no installation or user instructions have ever been produced for or associated with the device.

Should you have any questions regarding this matter, please contact Zachary Zehner at (202) 383-3424 to expedite resolving any outstanding issues regarding the pending application.

Sincerely,

WILKINSON BARKER KNAUER, LLP

Zachary A. Zehner

By: Jeffrey S. Cohen
Zachary A. Zehner*

Enclosures

*Practice limited to matters before federal courts and agencies.