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ELECTRONIC COMPLIANCE LABORATORIES, INC.



July 7, 2000

FEDERAL COMMUNICATIONS COMMISSION
Authorization and Evaluation Division
Laboratory Division
7435 Oakland Mills Road
Columbia, Maryland 21046

FCC ID: FNP42DMU9199 CONF. NM: EA95860

Subject: Response 14924

Gentleman;

On behalf of my client, XCI, Inc, I am submitting the following attached files per your request in correspondence letter 14924 dated July 6th 2000. Hopefully this will answer the questions to your satisfaction. Basically, it is information, which has already been submitted but worded differently. Redundant but just the same I hope it addresses the issues of concern.

Now I realize that this is not a typical transmitter with regards to what you are used to seeing. This device is not transmitting Digital data packets, which are typical. This is an ANALOG device designed to comply with the rules and regulations set forth in CFR 47 FCC Part(s) 15.247 as related to Radio Frequency Devices **operating** in the 902-928 MHz Frequency Range. This device is a Frequency Hopping Spread Spectrum for Intentional Radiator(s). The only difference is that the memory functions are not of a digital nature but an analog type of memory, which encompasses the intelligence, and sophistication of the protocol used in transmitting digital data packets. Unfortunately, digital methodology was not option for this specific functionality and desired application. This proprietary methodology is virtually harmless to the environment with its transmissions and it can be regulated quite brilliantly and will prove to be a very valuable asset to the specific applications for which it has been designed. Some of which are government related. So I would like to ask that we look specifically at the spectrum issues and not so much at the past utilizations for the allocated Frequency range under these rules and regulations. This is an ANALOG device, which operates in the FHSS mode.

Please find the following attachments enclosed with this submittal:

Reply14924cov.pdf	This letter
Response14924.pdf	Detailed response
XCIImpe.pdf	MPE Calculations/Statement
InternalPHOTOS.pdf	Requested Photos

I apologize for not having the external photos but I will forward those as soon as I can. If there is any additional information which may be required or you have any questions please do not hesitate to contact me at the numbers on file. Today the best way would be my mobile @408/593-7388 or via e-mail, chip@eclabs.com

Regards,

A handwritten signature in blue ink, appearing to read 'Chip Matheny'.

Chip Matheny
Chief Technical Officer

Remember, Always Design with Compliance in Mind...

ELECTRONIC COMPLIANCE LABORATORIES, INC.

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