

November 28, 2000

Ms. Linda Elliott
Mr. Steve Dayhoff
Mr. Frank Coperich
Federal Communications Commission
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21406

Re: *Schlumberger Resource Management Services, Inc.*
Response to Request for Further Information
FCC ID: F9C-CMM92STD (H6N- CCM92STD)
Reference Nos.: 16376, 16473, 17059, and 16663.

Dear Ms. Green, Mr. Dayhoff and Mr. Coperich:

We are writing in response to your separate requests for further information concerning the application to transfer the FCC Identification number of device F9C-CMM92STD.¹ On behalf of Schlumberger Resource Management Services, Inc. ("Schlumberger"), in August and September, 2000, we submitted applications to change all of the FCC Identification numbers held by CellNet Data Systems, Inc. ("CellNet"), grantee code H6N, to Schlumberger's grantee code, F9C. The purpose of these applications was to notify the Commission that Schlumberger purchased the assets of CellNet, including the equipment authorizations. The submissions consisted of a separate Form 731 for each of the devices and a single Form 159, which included payment for a single fee intended to cover all of the FCC Identification number transfers.

On September 28, 2000, we received e-mail correspondence from Ms. Elliott requesting further information regarding H6N-CCM92STD. Ms. Elliott requested that we supply

¹ A typographical error was made when filing the application, which should have been filed under FCC ID: F9C-CCM92STD, not F9C-CMM92STD. The current FCC ID for the device is H6N-CCM92STD.

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information concerning the former FCC ID numbers for the device. On October 6, 2000, we received e-mail correspondence from Mr. Coperich inquiring why Schlumberger filed an application for H6N-CCM92STD when a new application had been filed under F9C-CMM92STD. On October 18, 2000 we received e-mail correspondence from Mr. Dayhoff requesting that Schlumberger submit a photograph of the general appearance of the device and a copy of the RF Exposure Evaluation completed for the device. On November 13, 2000, we received further e-mail correspondence from Ms. Elliott requesting that the applicant for H6N-CCM92STD immediately pay the filing fee.²

Schlumberger has determined to utilize the verification procedures for all newly manufactured equipment, as provide for in section 101.139(b).³ For equipment including H6N-CCM92STD that is currently authorized under the former notification process, Schlumberger has determined not to change the FCC Identifier. Accordingly, we withdraw the application, Form 731 Confirmation Number EA98808, filed on September 20, 2000, for this device, and thus your inquiries related to this application are now moot.

In Mr. Dayhoff's e-mail correspondence of October 18, 2000, he requested the submission of a copy of the RF evaluation pursuant to section 2.1091. As an initial matter, the device, a Part 101 Licensed Non-Broadcast Station Transmitter, is not a "mobile device" as contemplated under section 2.1091(b). Furthermore, this device is categorically excluded from the requirement to perform a routine environmental evaluation for RF emissions pursuant to section 1.1307(b)(1) Table 1.

We are submitting a copy of this letter with its accompanying attachments to each of the individuals referenced above. We are also submitting this letter and accompanying attachments electronically, within 60 days of the earliest e-mail inquiry we received. Should you have any questions regarding this matter, please contact Zachary Zehner at (202) 383-3424 to expedite resolving any outstanding issues.

² A copy of each e-mail is attached.

³ See *Amendment of Parts 2, 15, 18 and Other Parts of the Commission's Rules to Simplify and Streamline the Equipment Authorization Process for Radio Frequency Equipment*, ET Docket No. 97-94, *Report & Order*, 13 FCC Rcd 11415 (1998) ("Streamlining Order").

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Sincerely,

WILKINSON BARKER KNAUER, LLP

A handwritten signature in black ink, appearing to read "Jeffrey S. Cohen". The signature is written in a cursive, flowing style.

By: Jeffrey S. Cohen
Zachary A. Zehner

Enclosures

Constantine, Jason

From: oetech@fccsun07w.fcc.gov
Sent: Friday, October 06, 2000 2:25 PM
To: jcohen@wbklaw.com

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Frank Coperich
fcoperic@fcc.gov
FCC Application Processing Branch

Re: FCC ID H6NCCM92STD
Applicant: CellNet Data Systems
Correspondence Reference Number: 16473
731 Confirmation Number: EA98790
Date of Original E-Mail: 10/06/2000

It is not clear why you have filed this application. In the process of converting the previous (H6N) Grants, a new application for Certification has been filed under F9CCMM92STD.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

DO NOT reply to this e-mail by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, in order to expedite processing, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.

Constantine, Jason

From: oetech@fccsun07w.fcc.gov
Sent: Wednesday, October 18, 2000 11:27 AM
To: jcohen@wbklaw.com
Subject: Technical Exhibits

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Steve Dayhoff
sdayhoff@fcc.gov
FCC Application Processing Branch

Re: FCC ID F9CCMM92STD
Applicant: Schlumberger Resource
Management Services Inc.
Correspondence Reference Number: 16663
731 Confirmation Number: EA98808

Please submit a photograph of the general appearance of the referenced equipment, and a copy of the RF Exposure Evaluation pursuant to Section 2.1091 of the FCC Rules.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

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Any questions about the content of this correspondence should be directed to the e-mail address listed below the name of the sender.

Constantine, Jason

From: oetech@fccsun07w.fcc.gov
Sent: Thursday, September 28, 2000 4:49 PM
To: jcohen@wbklaw.com

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Linda Elliott
lelliott@fcc.gov
FCC Application Processing Branch

Re: FCC ID H6NCCM92STD
Applicant: CellNet Data Systems
Correspondence Reference Number: 16376
731 Confirmation Number: EA98790
Date of Original E-Mail: 09/28/2000

Please submit the following explanation:

What are the former FCC ID's to the current FCC ID's for which changes in the identifications are requested.

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Zehner, Zachary

From: Cohen, Jeffrey
Sent: Monday, November 13, 2000 3:06 PM
To: Zehner, Zachary
Subject: FW:

Here's another. You probably will end up needing to call this staffer, to explain how we already paid a fee with the first application.

-----Original Message-----

From: oetech@fccsun07w.fcc.gov [mailto:oetech@fccsun07w.fcc.gov]
Sent: Monday, November 13, 2000 2:39 PM
To: jcohen@wbklaw.com
Subject:

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Linda Elliott
lelliott@fcc.gov
FCC Application Processing Branch

Re: FCC ID H6NCCM92STD
Applicant: CellNet Data Systems
Correspondence Reference Number: 17059
731 Confirmation Number: EA98790

Our records show that the fee has not been paid. PLEASE PAY THE FILING FEE IMMEDIATELY!!!

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

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