

ROGERS LABS, INC.

4405 West 259th Terrace
Louisburg, KS 66053
Phone / Fax (913) 837-3214

January 22, 2002

Federal Communications Commission
Equipment Approval Services
P.O. Box 35815
Pittsburgh, PA 15251-3315

Applicant: Garmin International, Inc.
1200 east 151ST Street
Olathe, KS 66062
Telephone number (913) 397-8200
FRN 0005-0885-88
Equipment: Aviation transceiver
FCC ID: IPH-0061100
FCC Rules: Part 87
Re: Correspondence reference number: 21808

MR. Stan Lyles:

In response to the request for additional information, correspondence reference number 21808, part of which is reproduced here for reference, the following information is submitted.

To: Scot Rogers, null
From: Stan Lyles
slyles@fcc.gov
FCC Application Processing Branch

Re: FCC ID IPH-0061100
Applicant: Garmin International Inc
Correspondence Reference Number: 21808
731 Confirmation Number: EA733784

- 1.) What's the difference to make this device narrow band?
- 2.) Page 10 of test report spurious emissions at antenna terminals, this test should be modulated Per Section 2.1049.
- 3.) .) Please note that the attenuation requirement for radiated spurious emissions is referenced to the desired signal yielding dBc. The attenuation specification is not XX uV/M, or derived from absolute value of the field strength. The dBc is determined from the substitution method such as described in the ANSI/TIA/EIA-603-1992 document.

What is needed is a determination of the actual power levels necessary to reproduce these field strength levels. Those power levels (from a signal generator source and a dipole antenna replacing the EUT) are then compared to the power output of the transmitter to determine dBc. That is the basis of the "substitution method".

Please submit data / results obtained in this manner.

4.) Page 15 Step 4 of test report shows input voltage from 5.10 Vdc to 6.90 Vdc. Page 16 of test report shows input voltage 23.80 Vdc, 28.00 Vdc and 32.20 Vdc. Please clarify.

5.) Please submit a reply copy of FAA letter. All filing are electronic.

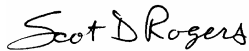
Response:

- 1.) There is no difference to make this radio a narrow band device. It functions in the same manner as an earlier version of this aviation transceiver (FCC ID number IPH-0021400).
- 2.) The spurious emissions at the antenna terminal were tested with the unit modulated as required by section 2.1049.
- 3.) The radiated spurious emissions have been retested and results are included in the revised test report (file name GNS430A.pdf) which has been uploaded to the FCC web site.
- 4.) The type error on page 15 of the report has been corrected.
- 5.) The FAA does not return a letter to the manufacturer unless they have a concern about the equipment. The letter informing the FAA about the transceiver (file named gns430a_faa_fcc.pdf) has been uploaded to the FCC web site for your review.

Please proceed with the grant of certification procedure. Should you require any further information, please contact the undersigned.

Thank you for your consideration in this matter.

Sincerely,



Scot Rogers
Rogers Labs, Inc.
Enclosures