TRP

14085 Howard Rd
Dayton, MD 21036

October 17, 2000

Federal Communications Commission Laboratory
7435 Oakland Mills Road
Columbia, MD 21046

Re: Spread spectrum transmitter certification September 22, 2000 under
FCC ID: O2OBTPCM101

Gentlemen:

I have been retained and given Power of Attorney by Digianswer A/S, the grantee for the reference equipment, to address certain issues that have arisen after issuance of the grant for the referenced transmitter. Specifically, an administrative error was made during the filing process that resulted from a failure to specify in the application filing an additional operating power level for the transmitter.

The test data submitted with the application was taken with the unit operating in its highest power level, + 16.36 dBm measured on a conducted basis which is equivalent to +18.88 dBm EIRP, when the highest gain of the internal antennas is considered. The unit is also capable of operation at a lower power level, +1.7 dBm measured on a conducted basis which is equivalent to 4.3 dBm EIRP, considering the antenna gain. as shown in the application currently pending under proposed FCC ID O2OBTPCM100. As the latter application explains, power levels are software selectable and can be set at either high power or low power. However, when set to high power, the system operates with a power control feature that automatically reduces the power output from the unit to the lower level when communications can be accomplished at the lower power setting. Accordingly, Digianswer respectfully asks the Commission, under its authority, to set aside the grant issued for the equipment identified as FCC ID: O2OBTPCM101 and simultaneously to reissue it with the eirp levels of 78 mW and 2.7 mW. These levels are intended to provide the unit with the capability of operating at the nominal levels of 20 dBm and 0 dBm, consistent with the Bluetooth specification, which calls for operation at such levels.

In this respect, Digianswer notes that the original grant specified a conducted output power of 44 milliwatts. As a result of discussions with a Laboratory staff member, I understand that it would be more appropriate for any grant for this equipment to specify power levels from the transmitter in terms of EIRP due to the fact that the radiating system is permanently attached to the transmitter. The test data and RF exposure data (taken at the high power level) that is currently on file with the Commission shows a maximum EIRP level from the unit of 78 milliwatts. The test report submitted with the application identified under O2OBTPCM100, for which data were taken at the lower power level, shows a maximum EIRP level of 2.7 milliwatts. For this reason and based on the discussions with the staff, Digianswer is asking that the grant issued by the Commission reflect the transmitter output powers as 78 milliwatts EIRP and 2.7 milliwatts EIRP. If this course of action is acceptable to the Commission, upon issuance of the revised grant under FCC ID O2OBTPCM101, I will then request dismissal of the pending application identified under proposed FCC ID O2OBTPCM100, which was filed in an effort to obtain an authorization for the nominal 0 dBm power level for the same device. The test report associated with O2OBPTCM100 should then be associated with O2OBTPCM101.

Please contact me with any questions concerning this matter.

Sincerely,

Phillip M Inglis
Consultant

Attachment: Power of Attorney