



February 21, 2001

Federal Communications Commission
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21046

Dear Review Personnel:

The purpose of this letter is to comment on the attached filing, which requests a Grant of Authorization for a RF transceiver module. Since there are no officially stated rules governing the approval of a module, we are relying on the FCC's stated opinion that has been uniformly applied to products of this type. I have attached an example of that opinion, which defines six points which must be satisfied in order to receive approval as a module. The module in the attached filing  meets these points as follows:

- 1) The module includes a full metal RF shield over all of the RF components. In addition, careful attention was given to the layout of the board traces and system grounding to control any unintentional emissions.
- 2) The module uses an on board buffer to prevent incorrect signals applied to the transmit data input from causing over-modulation or other unintentional emissions from the module. In addition, this buffer uses an enable line that prevents any modulation when the module is not in the transmit mode.
- 3) The module includes precision on board voltage regulators for all RF components. Supply voltage variations will not affect the modules intentional or unintentional emissions. In addition, the module incorporates a variable gain power amplifier that uses the internal regulated voltage to set the output power, and additional circuitry that shuts down the power amplifier when the module is not in the transmit mode.
- 4) The module was tested in two different configurations. The first configuration uses a permanently attached antenna. The second uses an external remote antenna. The remote antenna is connected to the module using a unique antenna connector (a special TNC connector that uses a left hand thread), which is not available to the general public.
- 5) The module was tested in a stand-alone configuration.
- 6) The module will include a label with its FCC ID number as proposed in the attached drawings. We currently plan to use this module internal to end products that we manufacture, where the label on the module is not visible. I have also enclosed drawings that depict the proposed labeling for these products that include the module identification.

Respectfully,

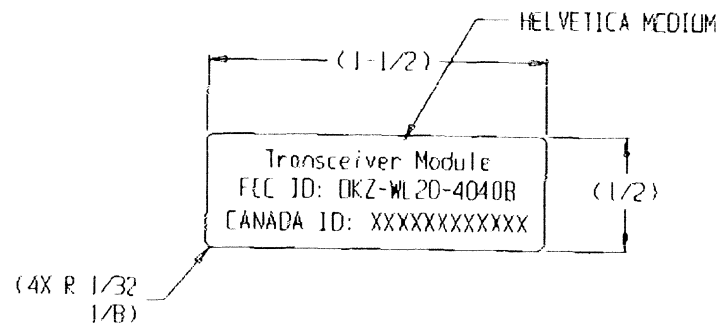


Brian Dearden
Staff Engineer - Project Manager
Barton Instrument Systems LLC

I

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REVISIONS				
REV	BO/DRW	DESCRIPTION	DATE	APPROVED
0A	33111	PRELIMINARY RELEASE	03-08-01	<i>Blade</i>
0B	33196	ADDED CANADA ID NUMBER	04-27-01	<i>Blade</i>



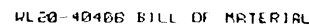
- 5 TO BE FURNISHED IN PRE-PRINTED FORM.
- 4 COLOR TO BE BLACK CHARACTERS ON WHITE BACKGROUND.
- 3 PROPORTION NOMENCLATURE APPROXIMATELY AS SHOWN

2 FURNISH IN ROLL FORM WITH PAPER BACKING

⚠ MATERIAL: MAKE FROM BARTON P/N D057-10371.

NOTES: UNLESS OTHERWISE SPECIFIED

UNLESS OTHERWISE SPECIFIED	DRAWN L. MENA	DATE 0-0-0	Barton INSTRUMENT SYSTEMS, LLC CITY OF INDUSTRY, CA. U.S.A. 91745-1404	
ALL DIMENSIONS ARE IN INCHES	CHECK <i>Blade</i>	0-0-0	TITLE LABEL, PCB I.D., WL20-4040B FCC	
TOLERANCES ARE: FRACY ± 1/32 .XX ± .01 .XXX ± .005 ANGLES ± 2°	DESIGN <i>Green</i>	03-08-01	SIZE B	
REMARK ALL TURNS AND STOPS SHOWN IN ACCORDANCE TO 41A REG. STANDARD SYMBOLS	APVD <i>Blade</i>	03-08-01	PSCN NO. 05991	
	MATL FINISH		DRAWING NO. WL20-4043G	
			SCALE 2/1	
			356260	
			SHEET 1 OF 1	



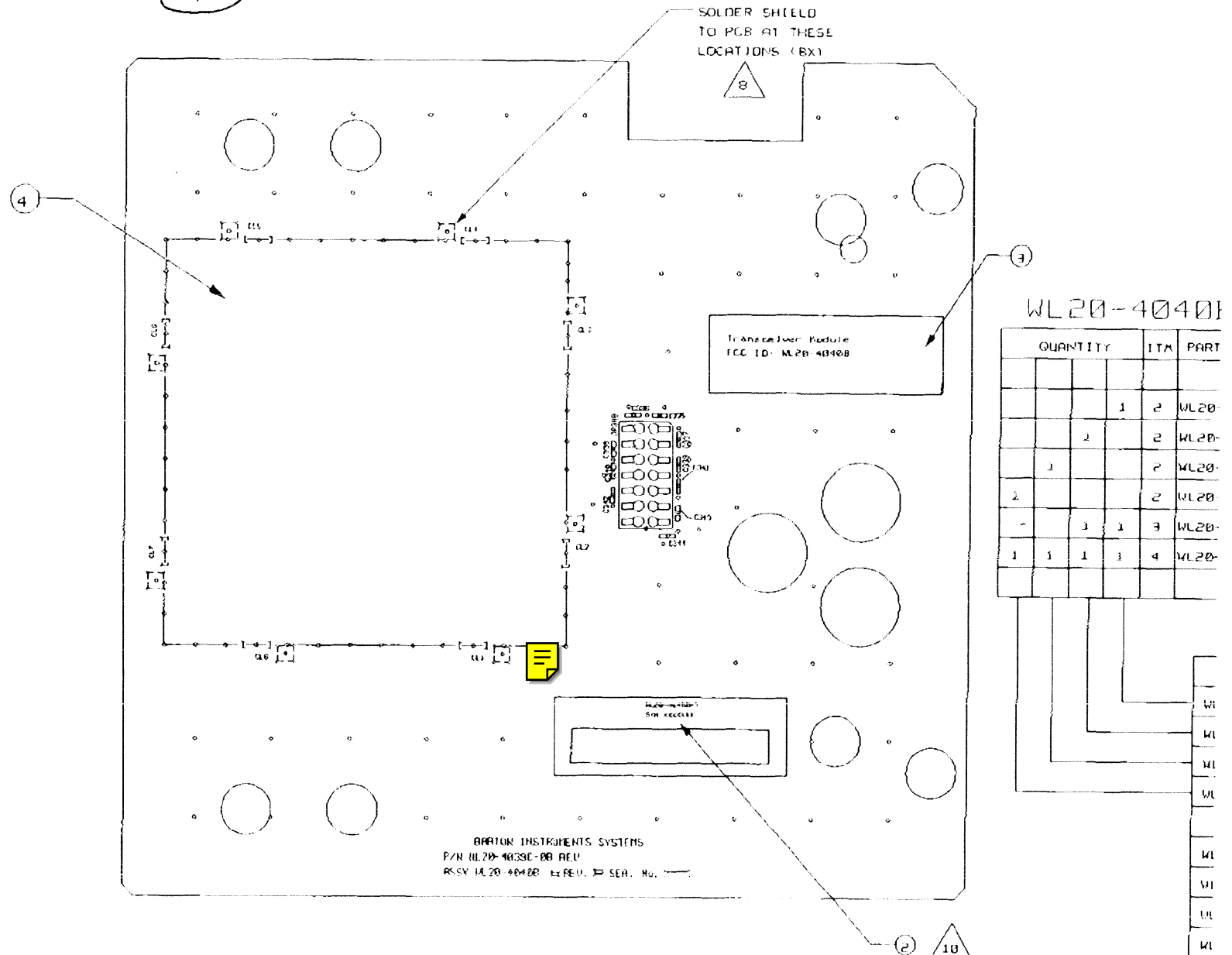
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NAME	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200

Case No.	Age	Description
Case No. 1	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 2	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 3	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 4	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 5	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 6	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 7	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 8	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 9	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.
Case No. 10	21	PERICARDIAL FLUID (HYDROPERICARDIUM) BY CENTIFUGAL DEPOSITION, INTERST. INF.

[illegible][illegible]

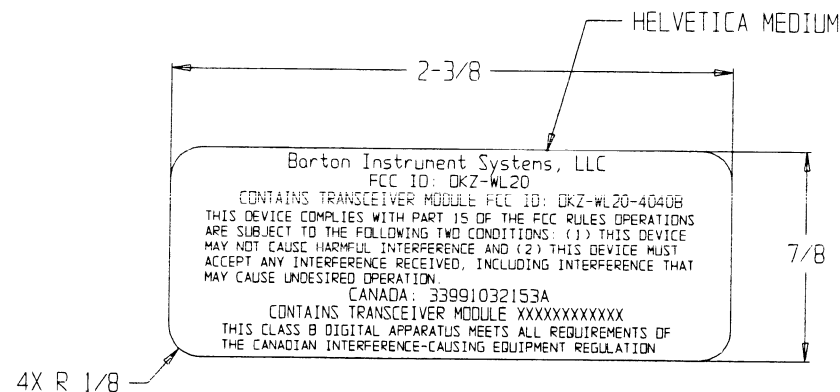
BILL OF MATERIALS FOR COMMON PARTS ML20-4042B

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REPAIRS FROM 1975-1976	SHIP		RADIO TRANSCEIVER RF
REPAIRS FROM 1977-1978	SHIP		PCB MODELS WL WU
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REPAIRS FROM 2531-2532	SHIP		1000 mm
REPAIRS FROM 2533-2534	SHIP		1000 mm
REPAIRS FROM 2535-2536	SHIP		1000 mm
REPAIRS FROM 2537-2538	SHIP		1000 mm
REPAIRS FROM 2539-2540	SHIP		1000 mm
REPAIRS FROM 2541-2542	SHIP		1000 mm
REPAIRS FROM 2543-			



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REVISIONS				
REV	EO/DRN	DESCRIPTION	DATE	APPROVED
0A	32866	PRELIMINARY RELEASE	07-27-00	<i>BRD</i>
0B	32910	ADDED "BARTON INSTRUMENT SYSTEMS, LLC" & CANADA NO.	09-13-00	<i>BRD</i>
0C	33099	ADDED "CONTAINS TRANSCEIVER MODULE-----"	2/21/01	<i>BRD</i>



4 COLOR TO BE BLACK CHARACTERS ON WHITE BACKGROUND.

3 PROPORTION NOMENCLATURE APPROXIMATELY AS SHOWN

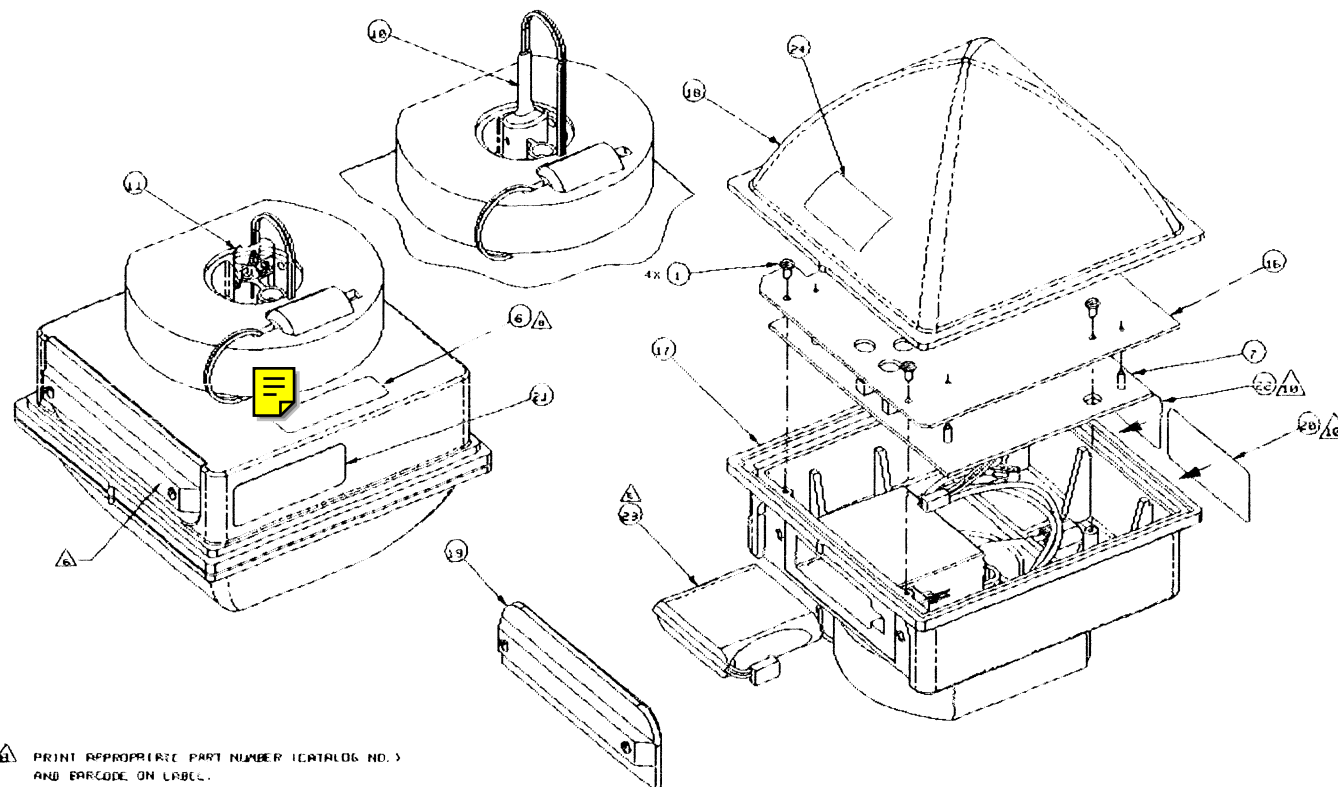
2 FURNISH IN ROLL FORM WITH PAPER BACKING

① MATERIAL: OVERLAMINATION: 3M 7732
 LABEL: 3M 7816--CSA APPROVED.
 ACCEPTED MFR LR99316

MAY BE PURCHASED FROM:
 WATON LABEL PRODUCTS
 3684 FOREST PARK BLVD.
 ST. LOUIS, MO. 63108
 (314) 652-6715

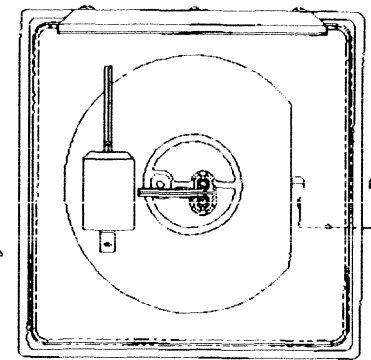
NOTES: UNLESS OTHERWISE SPECIFIED

UNLESS OTHERWISE SPECIFIED	DRAWN J SHADE	DATE 07-27-00	Barton INSTRUMENT SYSTEMS, LLC CITY OF INDUSTRY, CA. U.S.A. 91745-1404	
	CHECK <i>BRD</i>	07-27-00		
	DESIGN <i>J SHADE</i>	07-27-00	TITLE LABEL, FCC/CANADIAN- WL20 MONITOR, NORTH AMERICAN	
	APVD <i>BRD</i>	07-27-00		
	MATL 1		SIZE B	FSCM NO. 05991
FINISH			DRAWING NO. WL20-4036G	
REMOVE ALL BURRS AND SHARP EDGES EQUIVALENT TO .012 MAX. SURFACE ROUGHNESS 63/			SCALE 2/1	FILE NO 351785.PRT
			SHEET 1 OF 1	



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1. PRINT APPROPRIATE PART NUMBER (CATALOG NO.) AND BARCODE ON LABEL.
 2. PURGE AND FILL WITH 3 PSIG (15.7PSIA) DRY NITROGEN AND INSTALL BALL (ITEM 2).
 3. BATTERY & DOOR, ITEMS 15 & 20, NOT TO BE RESEMBLED. SHOWN FOR REFERENCE. TO BE SUPPLIED WITH UNIT IN CLAM SHELL CONTAINER.
 4. VIBRATION WELD JOINT, ITEM 18, TO ENCLOSURE, ITEM 17. WELD TO BE TESTED FOR LEAKS BY PNEUMATIC VACUUM OF 0.3 MILLI METERS OF MERCURY AND HOLDING 15 FOR 30 SEC.
 5. PERFORM AIR TIGHTNESS CALIBRATION PROCEDURE. INSTALL LABEL, ITEM 16.
 6. INSTALL PINS, ITEM 7 & 15, INTO ENCLOSURE, ITEM 17, WITH 4 SCREWS, ITEM 3.
 7. PLUG BATTERY CONNECTION FROM PCB, ITEM 7, TO GOLD PLATED PINS ON BATTERY COMPARTMENT. FUSE FOLDED ZINC-ANTHRACITE BATTERY CONNECTION BY MELTING PLASTIC AS SHOWN IN DETAIL D WITH SOLIDCORE IRON. MELT JUST ENOUGH TO RETAIN CONNECTOR & NOT MELT THRU BATTERY COMPARTMENT.
 8. a) PLUG SOCKET CONNECTIONS TO AIR PINS (2). b) TUCK COILED COPPER CABLE UNDER BATTERY COMPARTMENT IN ENCLOSURE. c) FASTEN FERRITE TO ENCLOSURE, LOCATED AS SHOWN WITH LOCATOR #11. ITEM 4. SHIP BOTH PICES TOGETHER, ITEMS 7 & 15. PLUG CORD CONNECTION TO PCB, LOCATION NO. "J200" & STRAIN RELIEF CORD CABLE WITH ITEM 5 JUST PRIOR TO PCB INSTALLATION. (NOTE 3)

NOTES UNLESS OTHERWISE SPECIFIED



SECTION A - F

[illegible]