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August 26, 1999

Chief, Equipment Authorization Branch,
Authorization and Evaluation Division,
Office of Engineering and Technology
FEDERAL COMMUNICATIONS COMMISSION
P.O. Box 358315
Pittsburgh, PA 15251-5315

Gentlemen:

The enclosed documents constitute a formal submittal and application for a Grant of Equipment Authorization pursuant to Subpart C of Part 15 of FCC Rules (CFR 47) regarding intentional radiators. Data within this report demonstrates that the equipment tested complies with the FCC limits for intentional radiators. The testing was performed in accordance with "Proposed FCC Part 15 Test Matrix - NovaRoam DSSS Transceiver Revision 1.1, 30 Jul 99". This test matrix was reviewed and approved by Greg Czumak as "Proposed FCC Part 15 Test Matrix - NovaRoam DSSS Transceiver Revision 1.0, 28 Apr 99". Please note the following differences between revision 1.0 and 1.1. We do not believe that this affected the validity the NovaRoam test plan as approved by Greg.

- Mode #5 has been changed from 378kbps BPSK to 317kbps QPSK, with the chip rate staying the same.
- The RF channel limits have been changed from 908 to 922MHz to 909 to 921MHz in Modes #4 through 6.
- The RF channel limits have been changed from 909.5 to 920.5MHz to 909 to 921MHz in Mode #7.
- The order of the performing the EMC tests has been rearranged.

Elliott Laboratories, as duly authorized agent prepared this submittal. A copy of the letter of our appointment as agent is enclosed.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,

David W. Bare
Principal Engineer

DWB/bab

Enclosures: Agent Authorization Letter
Emissions Test Report with Exhibits

File: R33424



30 Aug 1999

Mr. Charlie Cobbs
Federal Communications Commission
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

Dear Mr. Cobbs:

I am writing to avoid the possibility of an inadvertent disclosure of proprietary information.

The accompanying Form 731 is being filed with the Commission on our behalf by Elliott Laboratories, Inc., a consulting and testing laboratory. Included as an exhibit with the enclosed application are block diagrams, schematic diagrams, Theory of Operation, and the photographs requested in Form 731.

It is our intention to provide the Commission with a full disclosure of our process so that its merits can be evaluated fully. Indeed, we are pleased to provide any further information that the Commission might wish to see. It is not our intention, however, to make our proprietary process a matter of public record. In view of the fact that the block diagrams and associated Theory of Operation disclose the mechanism of our process, we ask that these portions (block diagrams, schematic diagrams, and Theory of Operation) of our application be withheld from public inspection as provided under FCC §0.459. These diagrams contain details of the operation of circuitry which is partially embedded in complex NovaRoam 900 devices. These details are not readily discernible - even to technically sophisticated individuals - from our hardware and constitute trade secrets.

We request that these documents and this letter be segregated from the book evaluation report and withheld from public inspection.

Thank you for your attention. Please let the undersigned know if the Commission disagrees with our position or requires further justification.

Sincerely,

A handwritten signature in dark ink, appearing to read "P. Krotchen", is written over a light blue horizontal line.

Paul Krotchen
Vice President



3 May 1999

To whom it may concern:

I hereby certify on behalf of Nova Engineering, 5 Circle Freeway Drive, Cincinnati, OH 45246, ("Applicant") that neither Applicant nor any party to the application (officers, directors, and 5% shareholders) is subject to a denial of Federal benefits that includes FCC benefits pursuant to §5301 of the Anti-Drug Abuse Act of 1988. 21 U.S.C. 853a.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Krotchen", is written over the typed name.

Paul Krotchen
Vice President
Nova Engineering



3 May 1999

Federal Communications Commission
7435 Oakland Mills Road

Columbia, MD 21046

Subject: Agent Authorization

Gentlemen:

This is your letter of authorization to accept Nova Engineering's appointment of Elliott Laboratories, Incorporated as agent for Nova Engineering located at 5 Circle Freeway Drive, Cincinnati, OH 45246, to sign applications before the Commission and to make representations to you on its behalf. Elliott Laboratories is to receive and exchange information between Nova Engineering and the Commission. This authorization is made pursuant to §2.911(c) of the FCC Rules and expires on 3 May 2000.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Krotchen", is written over a horizontal line.

Paul Krotchen
Vice President
Nova Engineering