American Telecommunications Certification Body Inc.

6731 Whittier Ave, McLean, VA 22101

July 5, 2001

RE: Maxon
FCC ID: AWWUBZGR14

I have the following comments on this Application.

1.) There is no agent authorization included with this application on applicant letterhead. Therefore the Confidentiality letter is also invalid. Please supply.

Please see the uploaded Authorization letter.

2.) It is not easily apparent from the index of the manual where the RF Exposure expository statements are located. Additionally, RF Exposure Information indicates that RF statements should be in manual. Where? Identify by page number

3.) Is this the correct manual? The manual identifies this as a Kenwood product.

Maxon is doing this for Kenwood.

4.) Please provide a listing of all available channels to the nearest 10 Hz in order to show compliance with 95.627.

Please see revised report

5.) The test report does not identify how the radiated power ERP measurements were made at both the carrier and spurious emissions. Only substitution method is permitted. The method identified in Section 6 is not acceptable for anything other than digital emissions.

Only substitution measurements were made for ERP and spurious emissions, this section applies to the digital/receiver section of 6.1.2 only.

6.) Was a power off condition observed during each temper stabilization period? The ½ hour initial stabilization period is also considered too short. An hour is considered minimum time.

Section 7.1 states "The temperature was initially set to -30°C and a 2-hour period was observed for stabilization of the EUT.
The frequency stability was measured within one minute after application of primary power to the transmitter. The temperature was raised at intervals of 10 degrees centigrade through the range. A ½ an hour period was observed to stabilize the EUT at each measurement step and the frequency stability was measured within one minute after application of primary power to the transmitter."

7.) The maximum authorized bandwidth for F3E FRS units is 12.5 KHz. The mask used is wrong. Please see the table in 95.635(b) with applicable paragraphs being (1), (3), and (7). Show worst case of 2500Hz and maximum CTCSS tone/deviation.

Please see revised report. A 100 kHz span is used to show 25dB, 35 dB, and 43+ 10 log P of paragraphs 95.635(b)(1), (3), and (7) using CTCSS subchannel 19 (127.3 Hz). 100 Hz resolution and 12.5 kHz authorized bandwidth is used.

8.) Please use 100Hz as Occupied BW RBW

Please see revised report. A 100 kHz span is used to show 25dB, 35 dB, and 43+ 10 log P of paragraphs 95.635(b)(1), (3), and (7) using CTCSS subchannel 19 (127.3 Hz). 100 Hz resolution and 12.5 kHz authorized bandwidth is used.

9.) Please cross reference table of contents to 2.1046 through 2.1055

Please refer to revised report

10.) Please provide necessary bandwidth calculations based upon measured values for peak audio response and maximum deviation. Remember to include CTCSS deviations

Using 2.5 kHz deviation as narrowband deviation.

11.) Deviation limiting seems off – what is the deviation reference for 1000 Hz tone at 0dB? Show with and without CTCSS.

Please see revised report. Deviation reference for 1000 Hz tone at 0dB with and without CTCSS is –57.6 dBm. Retaken modulation limiting curves match a Bessel coefficient of 0.5, which matches modulation products for 2.5 kHz modulation in the mask plot in the revised report

12.) Is the unit capable of being used with rechargeable batteries or while placed in a charger? If so, then AC conducted tests should be performed (reference only – Canada not FCC requirement).

Not able to be used in a charger, battery operated only.

William H. Graff
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President and Director of Engineering
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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. 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 sender.