

15 March 2000

FCC, Laboratory Division
Equipment Authorization Branch
7435 Oakland Mills Road
Columbia, MD 21046

RE: Application for Cubic Communications
FCC ID: NVSATC-100
Form 731 Conf. Number: EA97057

Dear Sir or Madam:

On 11 May 1999, Cubic Communications Inc. submitted the ATC-100 VHF Transceiver for Certification. Certification was subsequently received from the FCC on 28 September 1999.

Subsequently, the FAA requested that Cubic change the frequency range from its current 118.000 to 136.975 MHz, to cover from 117.975 to 137.000 MHz. This change within the aviation communication band represents the addition of one 25 kHz channel at either end of the range.

This change represents a minor change of performance and consequently we are requesting that the FCC certify the ATC-100 to operate within these two additional channels without further testing. We are making this request based upon the following considerations:

- a. The unit is presently certified and meets FCC requirements for this class of emitter
- b. The change is a minor expansion of the band being covered
- c. The frequency stability in the added channels will be the same as for the remainder of the band.
- d. The digital design makes the characteristics of the emitter identical in these two additional channels as for the rest of the band.
- e. The added channels are within the same operational aviation band and do not change the class or usage of the device.

- f. The modulation types used by the device in the two additional channels are the same as for the remainder of the band.

We request your favorable consideration of this permissive change. Should you require any additional information, please contact the undersigned at 858-643-5814, fax 643-5803, e-mail david.godgrey@cubic.com.

Sincerely,

CUBIC COMMUNICATIONS INC.

David Godfrey
Director,
ATC Business Development