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June. 18, 2004

Mark Briggs.

Elliott Laboratories  
684 W. Maude Avenue  
Sunnyvale, CA 94085

**Subject: FCC class 2 change request to our sister company Axcellera's product  
FCC ID OJBAB-ACCESS-SU01**

Dear Mark,

Microwave Data Systems is requesting a FCC class 2 permissive change to our sister divisions product the Ab-ACCESS product OJBAB-ACCESS-SU01.

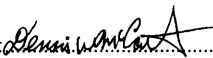
This class 2 permissive change is simply allowing a RADIO WAVES dish antenna to be used as a option instead of the integral panel antenna, the unit was initially FCC type approved with. Your FCC compliance testing has proved that the antenna easily meets the FCC part 15 unlicensed transceiver requirements.

We request that the manufacturer RADIOWAVES 6 foot dish part number SP6-5.2 and all smaller dishes of the same topology are approved for use. The RADIO WAVES data sheet is included with this submission.

Axcellera has many customers that wish to use this system with external dish higher gain antennas to overcome mountainous path loss.

If you have any queries, please do not hesitate to contact me at 585 242-8440:

Yours truly,

Signed:  ..... Name: Dennis McCarthy .....

**Dennis McCarthy**  
Agency Compliance Engineer  
Microwave Data Systems  
175 Science Parkway  
Rochester NY 14620  
**Phone (585) 242-8440**  
Email [dmccarthy@microwavedata.com](mailto:dmccarthy@microwavedata.com)

Below is some pertinent email information that supports my request for LMA, "Limited Modular Approval" for the EL806 (902-928MHz) radio, this just gained LMA approval on from the FCC.

This should be enough supporting information to aid you in this LMA approval process for this 2.4GHz version of this transceiver.

-----Original Message-----

From: Joe Dichoso [<mailto:JDICHOSO@fcc.gov>]

Sent: Friday, August 01, 2003 9:48 AM

To: DMcCarthy@microwavedata.com

Cc: Rich Fabina

Subject: Re: FCC Modular radio Question, I need your help

Hello Dennis,

This would require a Class II permissive change. We would afford the same interpretation with the same justifications provided in the Class II permissive change. You will need to justify why all of the approved antennas require professional installation (e.g. tower mounted) and you need to demonstrate how the grantee will maintain/control the installation of the module into products that are professionally installed. The grant would be "limited" appropriately.

Regards,

Joe

>>> McCarthy, Dennis 07/31/03 11:21AM >>>

Hi Joe

It has been a long time since I have requested your assistance, but I am in need of some clarification on the FCC Modular rules, Per DA 00 1407 Call me if you have any questions.

We have just gained FCC approval on a new modular part 15 ISM band 902-928 FHSS radio design, the EL806, FCC ID E5MDS-EL806. It currently has FCC modular approval by Ultratech and TIMCO. This new radio was tested with the EXACT same antennas that we offer for our PROFESSIONAL INSTALLATION products.

The only difference is the antennas were permanently attached to the cables which interfaced to MMCX pigtail cable. This filled the FCC modular rules and thus a modular approval was granted.

Our data radios are "not for sale to the general public" and are for "industrial applications only".

We have many industrial customers now requesting professional installation of this product because of the unique RF connector and cable make it hard to use and much more expensive. Based on this information, can we take the EL806 and change the grant to LIMITED MODULAR APPROVAL, and go to the TCB and ask for a CLASS 1 change, for professional installation, limited modular approval, on this FCC grant.

We will no longer offer non standard cable connectors, or the associated accessories. But offer only the PROFESSIONAL INSTALLATION antennas only, since they were already tested with non standard connectors and cables. The EL806 will no longer be called a module and it will become a professional installation LIMITED MODULAR APPROVAL in our manuals and on the FCC grant. We will not sell this to the general public.

There will be no new testing involved as stated, and it will just be paperwork. It certainly seems easier to apply for a class 1 change to rewrite the FCC grant, get the TCB approval and list LIMITED MODULAR ONLY ,PROFESSIONAL INSTALLATION REQUIRED.

Joe, I base this request on the fact that our competition "Freewave Technologies" just was granted a permissive change in March 2003 to a "Limited Modular Approval" radio which has professional installation, and it is a OEM board solution FCC ID KNY-6231812519. This is drastically competing with us and puts us at an unfair competitive disadvantage. Here is the text off the grant

"This device is only approved for use when installed in devices produced by the Grantee or Grantee approved third-party OEMs. The antenna(s) to be used with this limited modular transmitter must be installed to provide a separation distance of at least 23 cm from all persons and must not be co-located or operating in conjunction with any other antenna or transmitter. This device must be installed in NEMA enclosures. End-users and installers must be provided with antenna installation and transmitter operating conditions for satisfying RF exposure compliance. Professional installation of this product is required"

All I am asking from you Joe is, to have the "Modular Approval" changed to "Limited Modular Approval" and allow us to compete fairly in the marketplace by offering the radio with Professional Installation. Thus we do NOT have to stock, offer non standard RF connectors and antenna connections. We propose shipping a MMCX to N pigtail cable with the professional installation LMA approval if you find my request valid.

Please call me if I have clarified my thoughts clearly enough for you.

Thanks Joe

Regards

Dennis

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Agency Compliance Engineer  
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