

December 20, 1999

Federal Communications Commission Authorization & Evaluation Division 7435 Oakland Mills Road Columbia, Maryland 21406

Attention: Equipment Authorization Branch

Subject: Certification for FCC ID: AXATR-409-A2

Gentlemen,

Ericsson Inc. requests certification (type acceptance) for the AXATR-409-A2. This OEM module transceiver is designed as a mobile for use in the AMPS/DAMPS cellular telephone system operates in the 800 MHz Domestic Public Cellular Radiotelephone Communications Services per Subpart H of part 22 and operates in the 1900 MHz Domestic Public Cellular Radiotelephone Communications Services, as per Part 24. When operating in the 1900 MHz range, DAMPS technology will be employed. This OEM module meets the requirements of IS-137A for operation in cellular systems.

This OEM module is similar to previously type accepted FCC ID: AXATR-400-A2.

Ericsson requests an exclusion from routine RF exposure measurements based on the discussion presented in Exhibit 11, RF Exposure Evaluation, and communications with Kwok Chan on 5/18/99. The primary reason for this request is due to hardware limitations of our burst mode making MPE evaluation infeasible because the module does not have a normal operating mode that would support the duration of an RF exposure evaluation. We have included specific instructions and warnings in Exhibit 8, OEM Interface Manual, regarding minimum separation distance, maximum antenna gain, and that use as a portable transmitter will require separate FCC approval for SAR compliance.

Ericsson Inc. requests confidentiality under 47 CFR 0.459 for the following exhibits listed:

Exhibit 4 Block Diagram
Exhibit 5 Schematic Diagrams

Justification of this request is that in order to facilitate the circuit miniaturization of the AXATR-409-A2, proprietary techniques were implemented in the transmitter, receiver, and baseband circuitry. To protect Ericsson's competitive advantage on these proprietary techniques, we request the above listed exhibits be held as confidential and withheld from the Public Information File.

Sincerely,

Rick Timmons

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