Uniden Engineering Services
181 N. Country Club Road
P.O. Box 580
Lake City, SC 29560
Phone (843) 374-3852
Fax (843) 374-8393

Uniden

January 7, 2005

TIMCO Engineering, Inc.
849 NW State Road 45
P.O. Box 370
Newberry, Florida 32669

Attn: Mr. Bruno Clavier

RE: Job 2103JC4 – Your Email dated 12/16/2004

FCC ID: AMWUT601

Dear Mr. Clavier:

Please accept this as Uniden's response to your email of December 16, 2004. In the following pages, I will attempt to provide an acceptable reply to the specific questions.

However, allow me to first make a general explanation of the relationship between the Job in question (2103JC4) for our Marine VHF Transceiver, identified as AMWUT601, and the 2.4 GHz DSS Wireless Microphone that is a dedicated component of the Marine VHF Transceiver. For your reference, a 2.4 GHz DSS Wireless Microphone was submitted to TIMCO in November 2004 and was tested under your Job 1917UT4. At the time that I made the submission, I verbally received confirmation from Ms. Sharon Hoffman that it would be possible for TIMCO to investigate the 2.4 GHz DSS Wireless Microphone, also identified as AMWUT601 as a Part 15.247 device, plus investigate as a TCB the combination of the wireless microphone as a component of the marine VHF radio under the rules for a Composite Device. Therefore, the 2.4 GHz DSS Wireless Microphone sample was tested at TIMCO's facility, and the marine VHF transceiver was tested at Uniden's FCC Registered Test Site in Japan.

Although the above responds to your question in item 4, I felt that this should be explained first. Please let me know if you have any questions or concerns over this point.

In the following pages, I will address the remainder of your questions in order of your email.

Regards,

James R. Haynes
Vice President, Engineering and Regulatory Affairs

Uniden's Responses

Your Question in the email of 12/16/04

1. RF exposure exhibit part 2.1091: Please provide such exhibit to support required separation distance to satisfy the FCC RF exposure requirements and limits for general population/uncontrolled environment.

Uniden's Response

A new Owner's Manual (Draft) is being submitted to replace the one that was originally submitted with this filing. The text in the following has not changed; however, the page numbers are different.

On page 15 of the new Owner's Manual, there are instructions for connecting the radio to an antenna. In the marine VHF transceiver market, except for portable devices, the radio manufacturer does not supply the antenna, which is the radiating element and the concern of FCC Part 2.1091. However, in the supplied Owner's Manual on page 15, a separation distance is specified for small and large types of typical marine VHF antennas available for user installations. Basically, the distance for small antennas is "3 feet" and for large antennas, the separation distance is specified as "6 feet".

Please note that the same language is used in a similar marine VHF radio, identified as AMWUT910, that was directly filed to the FCC by Uniden America Corp. in August 2003. The Commission issued the Grant of Equipment Authorization for this device on 9/26/2003. The verbiage can be reviewed in the Owner's Manual exhibit on page 11/64, which is maintained in the Commission's database.

Your Question

2. RF exposure – User's manual: All qualified end-users of this device must have the knowledge to control their exposure conditions and/or duration, and the exposure conditions and/or duration of their passengers and bystanders, to comply with the General Population/Uncontrolled MPE limit and requirements. A label, as described in this filing, must be displayed on the device to direct users to specific training information for meeting Occupational Exposure Requirements. Users must be provided with the training information, antenna installation and transmitter operating conditions for satisfying RF exposure compliance.

Uniden's Response

Please see the response to your question in item 1. However, the Owner's Manual on page 15 provides the FCC's suggested text for alerting users to the health risks associated with excessive radiation generated in marine VHF transmitters and emitted from the antenna.

Your Question

3. FYI – The equipment class on form 731 was GVH. It will be changed to TNB for part 80 VHF transceiver.

Uniden's Response

The subject Marine VHF Transceiver is being submitted as a compliant GMDSS radio that meets the requirements as mandated in Part 80.1101 in Subpart W of the Commission's Rules. Therefore, we believe that the Equipment Class should remain "GVH". However, in checking our original application Form 731, I noticed that the only emission designator filed was 16K0F3E. Please note that we are adding 12K6F2D to cover the emissions when Channel 70 is being used to transmit digital selective calling data. Additionally, an addendum to the Test Report is being filed that shows the bandwidth on emissions when the device is generating radio frequency signals on 156.525 MHz (Channel 70). Finally, please note that the equipment label as required in Part 80.1103(e) attests to the GMDSS compatibility.

Your Question

4. Form 731 and Test report: There references to a part 15 device operation in the 2.4GHz. Please explain, as we do not have any information on the low power part 15 device.

Uniden's Response

The body text of our letter covers this explanation. However, I will coordinate with TIMCO in the submission of a separate application Form 731 to cover the Part 15 portion of a composite filing.

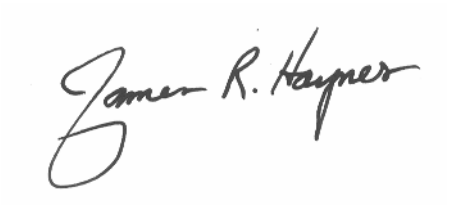
Your Question

5. Part 80.203(b) Frequency programming capability: Please provide an attestation for compliance with this section

Uniden's Response

On behalf of grantee, Uniden America Corporation, I personally attest that the requirements mandated in Part 80.203(b) are met in the design and manufacture of the subject radio identified as AMWUT601. Further, the Owners Manual that is provided with each radio being marketed contains verbiage required in FCC Part 15.21 that cautions against unauthorized modifications or changes.

Signed: Date: January 6, 2005



:

Your Question

6. Part 80.203(c) Transmit timer and indicator: Please provide an attestation or include info concerning compliance with this section. I did not find relevant info in the manual.

Uniden's Response

The Owner's Manual on Page 22 explains the feature and requirement of the transmitter timer as mandated in Part 80.203(c). Basically, it alerts the user that "*If you transmit continuously for longer than 5 minutes,* **TX** (meaning the indicator*) and the channel number blink and the radio stops transmitting*".

Uniden believes that the verbiage above meets the requested information that is the subject of your concern.