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JEFFREY COHEN
202 383-3369
jcohen@wbklaw.com

December 15, 2000

By Federal Express and Electronic Submission

Mr. Steve Dayhoff
Ms. Jaunice Green
Federal Communications Commission
Equipment Authorization Division
7435 Oakland Mills Road
Columbia, MD 21046

Re: *Schlumberger Resource Management Services, Inc.*
Response to Request for Further Information
FCC ID: F9C-CMM1401
Reference Nos.: 16661 and 16593.

Dear Mr. Dayhoff and Ms. Green:

We are writing in response to your request for further information concerning an application to transfer the FCC Identification number of device F9C-CMM1401. On behalf of Schlumberger Resource Management Services, Inc. ("Applicant"), in August, 2000, we submitted applications to change all of the FCC Identification numbers held by CellNet Data Systems, Inc. ("CellNet"), grantee code H6N, to Applicant's grantee code, F9C. The purpose of these applications was to notify the Commission that Applicant purchased the assets of CellNet, including the equipment authorizations. Pursuant to the direction of Richard Fabina, Chief, Equipment Authorization Branch, the submissions consisted of a separate Form 731 for each of the devices and a single Form 159, which included payment for a single fee intended to cover all of the FCC Identification number transfers.

On October 16, 2000, we received e-mail correspondence from Ms. Green requesting further information regarding F9C-CMM1401. Specifically, Ms. Green requested that we submit an application (Form 731), an exhibit containing the information required by section 2.933(a), and an exhibit containing information required by 2.929(d). In response to Ms. Green's request and after further discussion with Mr. Fabina, we now provide additional information pursuant to

section 2.933 of the Commission's rules. Since there is no change in design, circuitry or construction involved in the pending application to change the FCC Identifier for device F9C-CMM1401, we are submitting an exhibit with related attachments providing the information required by section 2.933(b). Beyond this exhibit, we also enclose a copy of an external photograph of the device, a copy of the Form 731 previously filed electronically with an exhibit describing the transaction, a copy of the Form 159 filed on behalf of Applicant and submitted for all of the equipment authorizations related to the transaction, and a copy of the e-mails sent requesting further information. We are also submitting all of the above materials and a copy of this letter electronically.

Regarding section 2.933(b)(5), referencing the photographs required by section 2.1033(b)(7), as we mentioned above, we are providing the photographs of the exterior appearance, and we are endeavoring to obtain sketch of the new label to be used in future production. We will provide this information as soon as it becomes available.

With respect to Ms. Green's request for further information pursuant to section 2.292(d), as discussed above, the assets of the existing grantee CellNet, including its equipment authorization for this device, have been purchased by Applicant. The Applicant's mailing address is: 1600 Alabama Highway 229, Tallassee, AL, 36078.

In addition to also requesting the submission of an external photograph of the device, Mr. Dayhoff requested the submission of a copy of an RF evaluation pursuant to section 2.1091 of the Commission's rules. As an initial matter, the device, a Part 15 Spread Spectrum Transmitter, is not a "mobile device" as contemplated under section 2.1091(b). Furthermore, this device is categorically excluded from the requirement to perform a routine environmental evaluation for RF emissions pursuant to section 1.1307(b)(1) Table 1. Accordingly, the Commission's rules do not require the submission of an RF evaluation.

Should you have any questions regarding this matter, please contact Zachary Zehner at (202) 383-3424 to expedite resolving any outstanding issues regarding the pending application.

Sincerely,
WILKINSON BARKER KNAUER, LLP

By: Jeffrey S. Cohen
Zachary A. Zehner*

* Practice limited to matters and proceedings before federal courts and agenies.
Enclosures

Exhibit

The following exhibit represents the "attached statement" and information required by section 2.933(b) of the Commission's rules for an application for an equipment authorization where no change in design, circuitry, or construction is involved:

1) Original Identification Used Prior to Change in Identification (section 2.933(b)(1)):

H6N-CMM1401.

2) The Date of the Original Equipment Authorization (section 2.933(b)(2)):

August 14, 1997. See attachment for copy of original equipment authorization.

3) How the Equipment Bearing Modified Identification Differs from Original Equipment (section 2.933(b)(3)):

The equipment bearing the modified identification does not differ from the original equipment.

4) Whether the Original Test Results Continue to be Representative of and Applicable to the Equipment Bearing Changed Identification (section 2.933(b)(4)):

The original test results continue to be representative of and applicable to the equipment bearing the changed identification.

5) The Photographs Showing Exterior of Appearance of Equipment (section 2.933(b)(5)):

See attachment.

Constantine, Jason

From: oetech@fccsun07w.fcc.gov
Sent: Wednesday, October 18, 2000 11:27 AM
To: jcohen@wbklaw.com
Subject: Technical Exhibits

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Steve Dayhoff
sdayhoff@fcc.gov
FCC Application Processing Branch

Re: FCC ID F9CCMM1401
Applicant: Schlumberger Resource Management Services Inc.
Correspondence Reference Number: 16661
731 Confirmation Number: EA98805

Please submit a photograph of the general appearance of the referenced equipment, and a copy of the RF Exposure Evaluation pursuant to Section 2.1091 of the FCC Rules.

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

DO NOT reply to this e-mail by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, in order to expedite processing, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. 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 e-mail address listed below the name of the sender.

Constantine, Jason

From: oetech@fccsun07w.fcc.gov
Sent: Monday, October 16, 2000 12:30 PM
To: jcohen@wbklaw.com

To: Jeffrey Cohen, Wilkinson Barker Knauer, LLP
From: Jaunice Green
jygreen@fcc.gov
FCC Application Processing Branch

Re: FCC ID F9CCMM1401
Applicant: Schlumberger Resource Management Services Inc.
Correspondence Reference Number: 16593
731 Confirmation Number: EA98805

Change of Identification, refer 98696

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information within 60 days of the original e-mail date may result in application dismissal pursuant to Section 2.917 (c) and forfeiture of the filing fee pursuant to section 1.1108.

DO NOT reply to this e-mail by using the Reply button. In order for your response to be processed expeditiously, you must upload your response via the Internet at www.fcc.gov, Electronic Filing, OET Equipment Authorization Electronic Filing. If the response is submitted through Add Attachments, a message which informs the processing staff that a new exhibit has been submitted must also be submitted via Submit Correspondence. 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 e-mail address listed below the name of the sender.

Federal Communications Commission

The Form 731 Application You Just Entered Has Been Submitted Successfully to the Laboratory Division. Please Record The Following Information For Future Reference:

If any information has been entered incorrectly on the 731 or 159 form, please contact btaube@fcc.gov for correction rather than submitting a second 731 or 159.

Form 731 Confirmation Number:	**EA98805**
FCC ID:	**F9CCMM1401**
Date of Submission:	**Sep 20 2000 3:11PM**
Press this button to begin document submission process.	**Press this button to go directly to FCC Remittance Form (Form 159).**
Proceed to Exhibits Form	Proceed to Fee Form (159)

Federal Communications Commission

Confirmation Number: EA98805
FCC ID: F9CCMM1401
Wed Sep 20 15:11:47 EDT 2000

Status	File Size (bytes)	File Description	Exhibit Type	File Format
	4041	Description of Transaction	Cover Letters	WordPerfect

Send More Exhibits | Initiate Fee Form (159)

FEDERAL COMMUNICATIONS COMMISSION - FCC FORM 731
APPLICATION FOR EQUIPMENT AUTHORIZATION

Approved by
3060 - 0057
Expires 9/30

You will be presented with the FCC FORM 159, Fee Remittance Advice after submitting your application and obtaining FCC Form 159, must currently be submitted in paper form along with payment to the address indicated in the FCC Fee I is not currently available.

Item 1. Applicant's complete, legal business name: **Schlumberger Resource Management Services Inc.**

Item 2. Applicant's mailing address

Line 1: 1600 Alabama Highway 229
Line 2:
P.O.Box:
City: Tallassee
State: AL Country(if foreign address): Zip/Postal Code: 36078

Item 3. FCC ID: Grantee code: f9c * Equipment Product Code (14 characters maximum): cmm1401

Item 4. Person at the applicant's address to receive grant or for contact:

First Name: Jim
Last Name: Brennan
Title:
E-mail:

Mail
Telep
Fax N

Item 5. Instead of Applicant, FCC is authorized to mail original Grant to:

Firm Name:
Address Line 1: P.O.Box:
Address Line 2: City:
Country(if foreign address): Zip/Postal Code:

Person at above address to receive Grant:
First Name: Last Name:
Title: Mail Stop:

Item 6. Technical Contact:

Firm Name: Telephone: Ext: Fax Nc
First Name: Middle Initial: Last Name:
Address Line 1: P.O.Box:
Address Line 2: City:
Country(if foreign address): Zip/Postal Code:
E-mail:

Item 7. Non-Technical Contact:

Firm Name: Wilkinson Barker Knauer, LLP Telephone: 202-783-4141 Ext: Fax Nc 202-78
First Name: Jeffrey Middle Initial: S Last Name: Cohen

Address Line 1: 2300 N Street, NW, Suite 700
P.O.Box:
Address Line 2:
City: Washington
Country(if foreign address):
Zip/Postal Code: 20037-1128
E-mail: jcohen@wbklaw.com

Item 8. * Does this application include a request for confidentiality for any portion(s) of the data contained in this application pursuant to 47 CFR § 0.459 of the Commission Rules? If "Yes" see instructions. ○ Yes ◉

Item 9. * Does the applicant request that the Commission defer grant of this application pursuant 47 CFR § 0.457(d)(1)(ii)? (See instructions) ○ Yes ◉
If so, specify date when grant may be issued (MM/DD/YYYY format):

Item 10. Equipment Code: DSS -Part 15 Spread Spectrum Transmitter
* Description of Product as it is Marketed: Utility Transmitter Maximum
* Equipment will be operated under FCC Rule Part(s): 15

Item 11. * Application is for:
○ Original Equipment (See instructions)
◉ Change in identification of presently authorized equipment: Original FCC ID: h6ncmm1401 Grant Dat
○ Class II permissive change or modification of presently authorized equipment (See instructions)

Item 12 . EQUIPMENT SPECIFICATIONS: (See instructions)

Frequency range in MHz		Rated RF power output in watts	Frequency tolerance		Em (See 47 C
917.58	917.58	.058			

Item 13. Is the equipment in this application:
* (a) a composite device subject to an additional equipment authorization? ○ Yes ◉
* (b) part of a system that operates with, or is marketed with, another device that requires an equipment authorization? ○ Yes ◉
If either of the above questions is answered "Yes" complete section 13(c).

(c) The related application:
○ has been filed at same time as this application under the FCC ID listed to the right
○ has been granted under the FCC ID listed to the right
○ is in the process of being filed under the FCC ID listed to the right
○ is pending with the FCC under the FCC ID listed to the right

Item 14. Name of test firm and contact person on file with the FCC, if different from applicant or contact person:
Firm Name:

First Name: Last Name:

Telephone: Ext: Fax No: E-mail:

Read each certification carefully before answering and signing this

WILLFUL FALSE STATEMENTS MADE ON THIS FORM ARE PUNISHABLE BY FINE AND IM SECTION 1001), AND/OR REVOCATION OF ANY STATION LICENSE OR CONSTITUTION PE 312(a)(1)), AND/OR FORFEITURE (U.S. CODE, TITLE 47, SECTION 503).

Item 15. SECTION 5301 (ANTI-DRUG ABUSE) CERTIFICATION:

The applicant must certify that neither the applicant nor any party to the application is subject to a denial of Federal ber 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. § 862 because of a conviction for possession or distribution of a contr definition of a "party" for these purposes.

Does the applicant or authorized agent so certify? (•) Yes ( ) No

Item 16. APPLICANT/AGENT CERTIFICATION:

I certify that I am authorized to sign this application. All of the statements herein and the exhibits attached hereto, are tr IN accepting a Grant of Equipment Authorization issued by the FCC as a result of the representations made in this appli equipment with the exact FCC ID specified in this application, (2) compliance statement labeling pursuant to the applical applicable technical rules. If the applicant is not the actual manufacturer of the equipment, appropriate arrangements ha production units of this equipment will continue to comply with the FCC's technical requirements.

Authorizing an agent to sign this application, is done solely at the applicant's discretion; however, the applicant remains

If an agent has signed this application on behalf of the applicant, a written letter of authorization which includes informa section 5301 (Anti-Drug Abuse) Certification statement has been provided by the applicant. It is understood that the lette request, and that the FCC reserves the right to contact the applicant directly at any time.

* Signature of Authorized Person Filing: Ben Lyon Title of auth Vice President

Complete items below if an agent signs the application

Firm Name: Telephone: Ext: Fax Nc

First Name: Middle Initial: Last Name:

Address Line 1: P.O.Box:

Address Line 2:

City: State: Country(if foreign address): Zip/Pc

E-mail:

NOTE: An asterisk '*' preceding a field indicates it must be completed before this applic

Continue Clear

STAMP AND RETURN

READ INSTRUCTIONS CAREFULLY BEFORE PROCEEDING
(1) LOCKBOX #358315

FEDERAL COMMUNICATIONS COMMISSION
REMITTANCE ADVICE
PAGE NO ___ OF

AUG 3 1

FCC/MELLON

APPROVED BY OMB 3060-058

FCC USE ONLY

SECTION A - Payer Information

(2) PAYER NAME (if paying by credit card, enter name exactly as it appears on your card)
Wilkinson Barker Knauer, LLP

(3) TOTAL AMOUNT PAID (dollars and cents)
$940.00

(4) STREET ADDRESS LINE NO. 1
2300 N Street, N.W., Suite 700

(5) STREET ADDRESS LINE NO. 2

(6) CITY
Washington

(7) STATE
DC

(8) ZIP CODE
20037-1128

(9) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE)
202-783-4141

(10) COUNTRY CODE (IF NOT IN U.S.A.)

If payer name and the applicant name are different, complete Section B. If more than one applicant, use continuation sheets (Form 159-C).

SECTION B - Applicant Information

(11) APPLICANT NAME (if paying by credit card, enter name exactly as it appears on your card)
Schlumberger Resource Management Service

(12) STREET ADDRESS LINE NO. 1
1600 Alabama Highway 229

(13) STREET ADDRESS LINE NO. 2

(14) CITY
Tallassee

(15) STATE
AL

(16) ZIP CODE
36078

(17) DAYTIME TELEPHONE NUMBER (INCLUDING AREA CODE)
334-283-6555

(18) COUNTRY CODE (IF NOT IN U.S.A.)

SECTION C - Payment Information

(19A) FCC Call Sign/Other ID	(20A) Payment Type Code(PTC)	(21A) Quantity	(22A) Fee Due for (PTC) in Block 20A	FCC USE ONLY
	EGC	1	$940.00	

(23A) FCC CODE 1: F9C26112495

(24A) FCC CODE 2: 13EA98587

(19B) FCC Call Sign/Other ID	(20B) Payment Type Code(PTC)	(21B) Quantity	(22B) Fee Due for (PTC) in Block 20B	FCC USE ONLY

(23B) FCC CODE 1

(24B) FCC CODE 2

(19C) FCC Call Sign/Other ID	(20C) Payment Type Code(PTC)	(21C) Quantity	(22C) Fee Due for (PTC) in Block 20C	FCC USE ONLY

(23C) FCC CODE 1

(24C) FCC CODE 2

(19D) FCC Call Sign/Other ID	(20D) Payment Type Code(PTC)	(21D) Quantity	(22D) Fee Due for (PTC) in Block 20D	FCC USE ONLY

(23D) FCC CODE 1

(24D) FCC CODE 2

SECTION D - Taxpayer Information (Required)

(25) **PAYER TIN** 0521264167

(26) Complete this block only if applicant name in B-11 is different from payer name in A-2
APPLICANT TIN 0 510204865

SECTION E - Certification

(27) CERTIFICATION STATEMENT
I, Jeffrey S. Cohen, certify under penalty of perjury that the foregoing and supporting information
(PRINT NAME)
are true and correct to the best of my knowledge, information, and belief. SIGNATURE Jeffrey S. Cohen

SECTION F - Credit Card Payment Information

Wilkinson Barker Knauer, LLP
2300 N Street N.W., Suite 700
Washington, D.C. 20037-1128

16-3
540 00012

58726

Date 08/29/00

$940.00

PAY Nine Hundred Forty and 00/100 Dollars

TO THE ORDER OF FEDERAL COMMUNICATIONS COMMISSION

RIGGS BANK, N.A.
LINCOLN OFFICE
WASHINGTON, D.C. 20006

AUTHORIZED SIGNATURE

⑈058726⑈ ⑆054000030⑆ 08451252⑈

COPY

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

COPY

GRANT OF EQUIPMENT AUTHORIZATION
Certification

CellNet Data Systems
125 Shoreway Road

San Carlos,CA 94070

Date of Grant: 08/14/1997

Application Dated: 04/29/1997

Attention: Forrest Fulton

NOT TRANSFERABLE

EQUIPMENT AUTHORIZATION is hereby issued to the named GRANTEE, and is VALID ONLY for the equipment identified hereon for use under the Commission's Rules and Regulations listed below.

FCC IDENTIFIER H6NCMM1401
Name of Grantee CellNet DataSystems

Equipment Class: Part 15 Spread Spectrum Transmitter

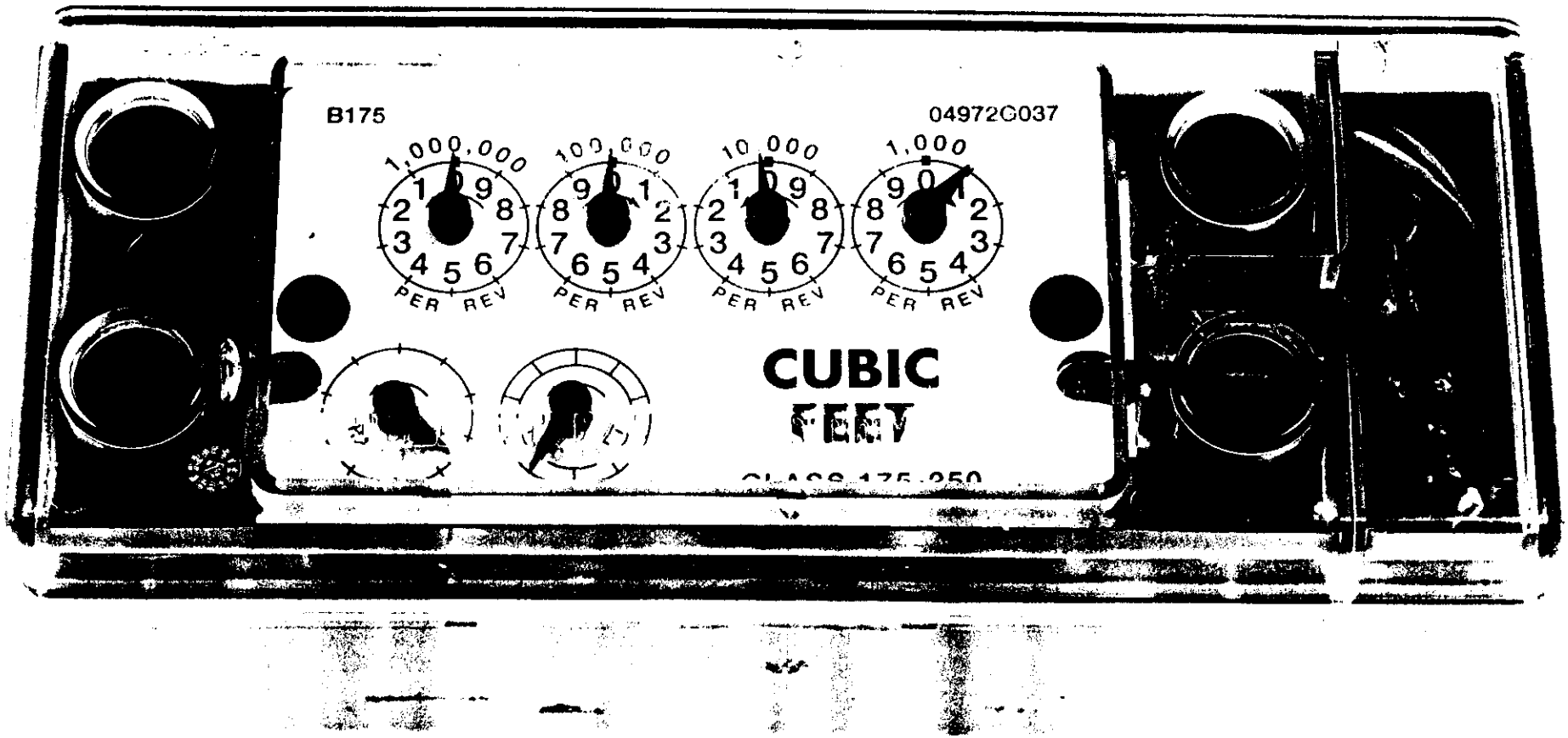
Notes: Utility Transmitter Maximum output power: 58 mW

Grant Notes	FCC Rule Parts	Frequency Range (MHZ)	Output Watts	Frequency Tolerance	Emission Designator
37	15	917.58 - 917.58		%	

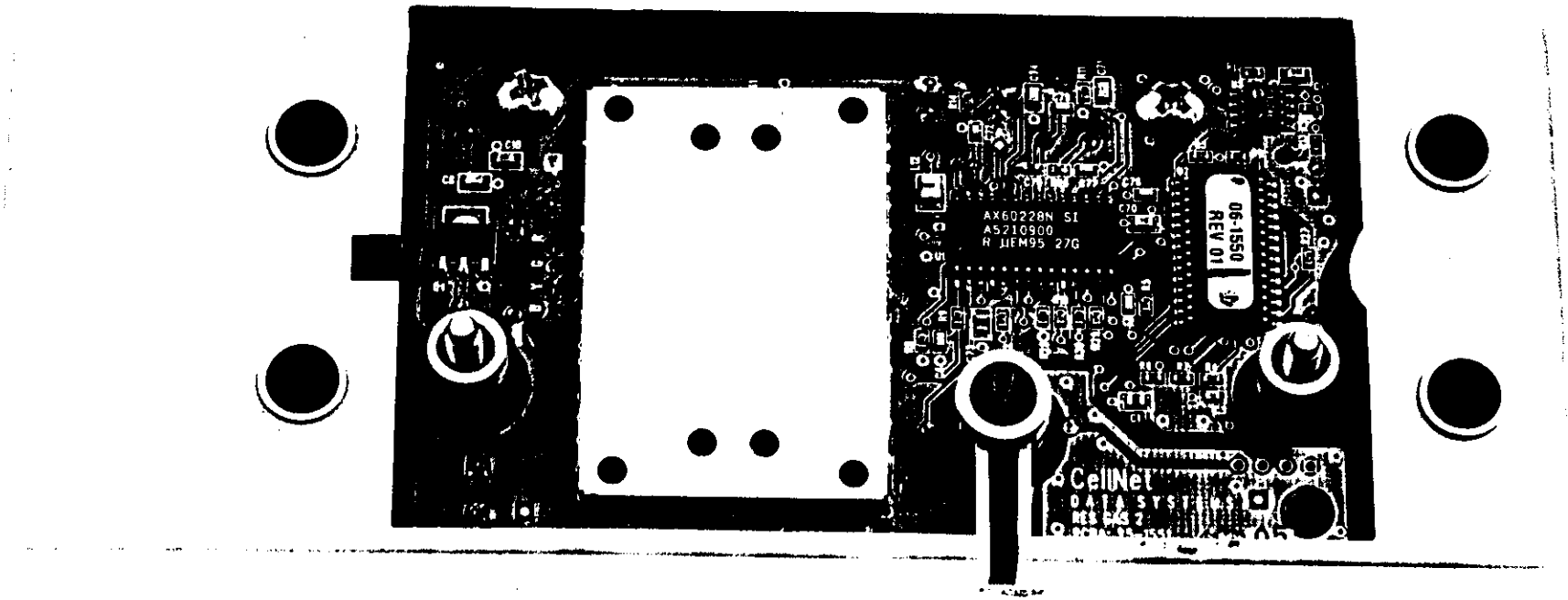
37: **This device has shown compliance with new rules adopted under Docket 87-389 and is not affected by Section 15.37, transition rule.**

Mail To:

9706098315666002



Cellnet Data Systems
FCC ID: H6NCMM1401
Front



Cellnet Data Systems
FCC ID: H6NCMM1401
Rear