

December 4, 1998

Chief, Equipment Authorization Branch, Authorization and Evaluation Division, Office of Engineering and Technology FEDERAL COMMUNICATIONS COMMISSION P.O. Box 358315 Pittsburgh, PA 15251-5315

Gentlemen:

The enclosed documents constitute a formal submittal and request for a Class II Permissive Change pursuant to Subpart C of Part 15 of FCC Rules (CFR 47) regarding changes to intentional radiators. A change is being proposed to the Cellnet model Vectron MFMM, which would result in changes to the performance characteristics originally reported to the Commission. Since the Vectron MFMMis presently certified, an emissions test has been performed to demonstrate that it continues to comply with FCC Part 15 limits for intentional radiators.

The output power from the device is higher than that previously reported in the original submittal. The increase is due to manufacturing variance and to the measurement uncertainties associated with the radiated field strength measurement used to calculate the output power. A previous application for a permissive change on a device with a similar change in output power was granted after the Commission altered the original grant to reflect the higher output power. We request that the same consideration be afforded to this application.

This submittal was prepared by Elliott Laboratories, as duly authorized agent. A copy of the letter of our appointment as agent is enclosed. Please also find enclosed a check in the amount of \$45.00 for the application fee.

If there are any questions or if further information is needed, please contact Elliott Laboratories for assistance.

Sincerely,

Mark Briggs

Manager, EMC Consulting Services

mbriggs@elliottlabs.com

Enclosures:

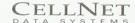
Application Fee

Agent Authorization Letter Anti-Drug Abuse Statement

Emissions Test Report with Exhibits



11/5/98



Federal Communications Commission Office of Engineering and Technology Laboratory Division 7435 Oakland Mills Road Columbia, Maryland 21046

To Whom It May Concern,

We, the undersigned, hereby authorize Elliott Laboratories Inc. to act on our behalf in all matters relating to applications for equipment authorization, including the signing of all documents relating to these matters. Any and all acts carried out by Elliott Laboratories Inc. on our behalf shall have the same effect as acts of our own. The Expiration date for this authorization is December 31, 1999.

We also hereby certify that no party to the applications authorized hereunder is subject to a denial of benefits, that includes FCC benefits, pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988, 21 U.S.C. 853 (a).

Sincerely,

Mike L. Gustafson

Director of Hardware Development

MLG/sb