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TCB & FCB

*FCC Approvals
Industry Canada Approvals
Notified Body for Europe*

December 4, 2007

Mr. Dave Galosky
FCC Equipment Authorization Branch
david.galosky@fcc.gov

SUBJECT: HUNT ELECTRONIC CO., LTD - FCC ID: UTBHL81IBW

Correspondence Number: 44653

731 Confirmation Number TC265332

Subject: Certification of this device should be under 15.247 instead of 15.249.

Dear Mr. Galosky,

Regarding the above Certification, it was submitted under FCC Part 15.249 because of the extremely low level emission output levels. This Security Video Camera system meets all the requirements as specified in FCC Part 15.249.

Because of its simplicity regarding test requirements, many Manufacturers submit jobs with low level output power (maximum 94dBuV/m) under 15.249 for devices operating in the same frequencies as Part 15.247 devices. I do not believe there is a rule against this and there are many Certifications on the FCC Web Site such as this.

The applicant specified they used video for actual testing. The Band Edge measurement at the low band edge and high band edge show the Occupied Bandwidth with the trailing edges showing compliance with the 54 dBuV/m limits. The signal was modulated with live data as shown in the Test Setup. This is true for the ancillary/support devices as well. Because of the very low emissions, FCC Part 15.249 was selected by them.

In summary, for FCC Part 15.249, radiated output power at the fundamental shall not exceed 94 dBuV/m average level. For the spurious radiated emissions, they must meet Part 15.209 requirements average level. Finally, band edge measurements (occupied bandwidth) must show compliance with the 15.209 limits. This Part 15.249 is similar to FCC Part 15.227 regarding simplicity.

This is true for the balance of the Part 15.249 jobs submitted for this Video Security System as listed above. I hope this helps answer all the questions regarding these applications. Thank you.

Best regards,
Timco Engineering