



American Telecommunications Certification Body Inc.
6731 Whittier Ave, McLean, VA 22101

November 3, 2006

RE: FCC ID: BV8VIDA-BB_ATCB004205

Attention: Richard McMurray / Kathy Grzovic

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below.

1 Please note that actual measured power is to be listed on the grant. However, as this is a part 90 device and if the manufacturer so states the rated power may be used. Please provide a clear indication if the manufacturer desires the rated power on the grant instead of the actual measured power as required by the FCC.

Response: The grant should reflect the actual measured power.

2 Please note that on page 30 of the report the spectral density/MHz is stated to be 20.981 dBm. Please note that this is less than .019 dB below the 21 dBm limit. Please also note that in looking at the plotted signal on page 30 it appears that there may be a slightly higher level at or about the 1 MHz area around the center frequency as well as at a frequency higher than listed. Please also note that as an attenuator was used during the test the actual value of attenuation may significantly affect the measurement of a signal that is so close to the limit. Please also note that if a cable was used in the test set up, the cable loss does not seem to have been accounted for in the test. If any cable was used then the device is probably not compliant as an expected cable loss of tenths of a dB to 1+dB may be present. Please also note that the loss occurring at the connectors of any cable, attenuator or analyzer may be sufficient to cause a higher reading. Any of these factors may put the level measured over the limit. Because the spectral density is so close to the limit, please re-verify compliance. In your verification, please include the actual attenuation inserted by the attenuator, any insertion loss due to the cable used to connect the EUT, attenuator and analyzer together. Please also address the potential ½ dB or more loss which may be caused by the use of connectors. Please also justify the analyzer settings (i.e. sweep time video bandwidth etc).

Response: Per FCC 90.1215(b), the resolution bandwidth was set to 1 MHz and the video bandwidth was set to a value greater than the resolution bandwidth (8 MHz). Peak search was used to find peak spectral density within 1 MHz of the signal bandwidth.

A combined 10 dB and a 20 dB attenuator was used between the EUT and Spectrum analyzer for PSD measurement. No cable was used; the attenuators were directly connected from EUT to Analyzer.

Path loss calculated as follows (this was checked across the frequency band of interest):

The system loss was measured by using a signal generator and reference cable. The attenuation was measured first with the reference cable, and then with the reference cable and attenuators.

Loss (reference cable/attenuators) – Loss (reference cable) = System loss

31.2 dB - 0.8 dB = 30.5 dB total system loss (relative offset entered into analyzer)

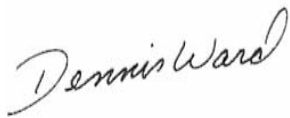
Please see the revised test report uploaded with this response.

3 FYI - Please note that the MPE information in the manual on page 2 states, "DO NOT TRANSMIT with this base station and antenna when persons are within the MAXIMUM PERMISSIBLE EXPOSURE (MPE) Radius of the antenna." This referenced section states, "After installation and commissioning, the safe distance from the 9 dBi omni-directional antenna is greater than 20 cm (8-inches)." However, the manual continues to provide MPE information for 27 dBi antennae under the section "MPE Calculation for Directional Antenna". Please note that the apparent conflict between the two sections should be addressed. Perhaps a change to include all MPE calculated separation distances may be appropriate. Please also note that this may simply be addressed at the time of licensing as well.

Response: Noted, thank you; a revised manual and revised MPE exhibit have been uploaded.

4 FYI – please note that due to the nature of this device you may also add internal photos to the confidentiality list if desired. If this is desired, please provide a revised confidentiality request.

Response: Noted, thank you; the applicant would like the internal photographs to be confidential so a revised confidentiality letter has been uploaded with this response.

A handwritten signature in cursive script that reads "Dennis Ward".

Dennis Ward
<mailto:dward@AmericanTCB.com>

The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Correspondence should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. 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 sender.