



A-PEX INTERNATIONAL CO., LTD.

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Date: December 2, 2002

RE: Seiko Instruments Inc.

FCC ID: C4ZAAWA0000

Dear Mr. Dennis Ward,

Regarding the above referenced application, please find our reply to the comments dated November 29, 2002:

To comment 1. Please find modified Form 731. In addition, we eliminated the description on conducted power measurement of maximum output power (item 5.3) on the test report. Please refer to the revised test report.

To comment 3: The device (watch) has receiver function and it is categorized as "all other receivers subject to Part 15" in 15.201. According to 15.201, either DoC or Certification is applicable to the device. Therefore, DoC logo seems to be correct for this device.

To comment 4: Thanks for your advice. Please withdraw RF Exposure Information that we uploaded.

We will address comment item 2 (label location) after we receive your confirmation on our reply to comment 3 (see above).

If any problems with the above answers, please kindly inform us.

Best regards,

Yukari Ito (Ms.)

A-Pex International Co., Ltd.