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Date: January 5, 2005

RE: ALEPH INTERNATIONAL CORPORATION

FCC ID: DNHXC-001-XT

Dear Mr. Dennis Ward,

Regarding the above referenced application, please find our reply to your comments dated December 29, 2004:

1) The numbers on page 4 of test report are not the test data of peak and average, but margins to the limits. [15.242 Average limit 127.9dBuV/m (2500mV/m), 15.35(b) Peak limit 147.9dBuV/m]

Please see page 14 and 15 for the actual test data.

2) The limit on page 12 and 13 of test report was not correct. We will modify it to 50dBc based on 15.245 (3), or 15.209.

3) Tested frequency, 21044MHz (Second harmonics) falls under "harmonic emission in the restricted bands above 17.7GHz" specified in 15.245(b)(1), and therefore we apply average limit: 77.5dBuV/m (7.5mV/m) in 15.245(b)(1)(ii) and peak limit: 97.5dBuV/m in 15.35(b).

If there are any problems with the above reply, please let us know.

Best regards,

Yukari Ito (Ms.)

UL Apex Co., Ltd.

