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12 March 2009

RE: Worth Data, Inc.

FCC ID: JWSB5001

Response to comments from 11 Mar 2009

NCEE responses are in blue.

1) The updated test report still appears to reference RSS-210 issue 7. Please review.

A new test report, "R073108-02-02F.pdf" has been uploaded.

2) The newly provided operational description uses 320 msec and 10 seconds between hops. It appears that this may be correct for a "per channel" EMC correction factor. However for RF exposure, we are concerned with true duty factor (i.e. TX on vs. TX off time worse case). It appears from the plots in the report that other channels are being transmitted on in the 10 seconds between hops back to the same channel. Not enough information is provided to determine actual duty factor for reviewing the appropriate RF exposure information. A preliminary estimate taken from some local channels nearby seen in the plots of Figure 11 suggest that maybe duty factor is > 50%. If so, it is still likely possible that the manual would required RF exposure information to be included. It is noted that the operational description provided does not clearly define maximum transmit for the base. If not source based (controlled in software/hardware – not by user use or controles), then we need to look at the maximum transmit rate of the TX for purposes of RF exposure. Please review and correct as necessary. Depending on the final values obtained – note that RF exposure information in the manual may be necessary.

A new RF exposure exhibit, "RFE073108-02-02C.pdf", has been uploaded as well as a new theory of operation "7001 and 5001 Theory of Operation Revised.pdf". The new documents state that the unit used half-duplex transmission and can only have a maximum duty cycle of 50%. See section 2.6 of the test report.