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January 20, 2009

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

RE: Comments of December 30, 2008
APPLICATION: FCC ID: LOBSHH200 & IC: 7955A-SHH200 for Cervis, Inc .

Dear Mr. Fabrina:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***.

Thank you for your attention. Please feel free to contact us for any additional information that you may require.

Regards,

Steven D. Koster
EMC Operations Manager

WLL Project: 10276

1. I do not believe the transmitter shown in this application is eligible for approval as a modular transmitter. FCC Rules in Section 15.212(a) define a modular transmitter as a completely self-contained RF transmitter device that is incorporated into another product, host or device. This application shows a complete transmitter, not a modular transmitter. Most modular transmitters have an interface port or ports to allow voltage, modulation and other inputs to the transmitter circuitry for incorporation into other hosts. A complete transmitter such as this device cannot be incorporated into another host like a modular transmitter. All the FCC interpretations that I am familiar with indicate that a modular transmitter is on its own PC board and has input ports for voltage, modulation and other inputs and is located inside another product. If you have an interpretation from the FCC allowing authorization of this device as a modular transmitter, please provide a copy of the interpretation along with the KDB number of this interpretation. This interpretation must address a number of issues: (1) the inclusion of a modular transmitter on the same PC board as the host device, (2) will the modular transmitter be exactly the same size every time, (3) will the modular transmitter be in the same location on the PC board of all different host devices and (4) will the components of the modular transmitter on the PC board be in the same position all the time. Either provide such an interpretation from the FCC or drop the request for modular approval of this transmitter. If you wish to discuss this issue with me, please call me in the afternoon at 703-635-2881.

R. The FCC has commented on this in the previous Cervis Base unit (FCC ID: LOBSBU200) allowing a modular approval for this kind of device. A new Modular Request Attestation letter will be submitted.

Note: In addition the Module was verified outside of it's enclosure for Radiated emissions. New test setup pictures will be uploaded.

2. The confidential operational description entitled General Description contains the statement in the first paragraph under the heading General Description that this transmitter operates in the 900 MHz band but all the other supporting documentation shows that this device operates in the 2.4 GHz Spread Spectrum band. Please address this discrepancy.

R. The operational description will be corrected to reflect the correct band of operation.

3. Please address the RF safety compliance of this transmitter. Section 15.247(i) of the FCC Rules requires all devices operating as spread spectrum devices to comply with the FCC RF exposure limits during use.

R. A MPE Report will be submitted.

4. In Figures 5-7, 5-8 and 5-9 of the test report for power spectral density measurements, please explain the meaning of the statement at the bottom of these Figures which reads "Plot is five 100 second, 300 kHz span sweeps appended to equal 500 second – 1.5 MHz." Also indicate in the FCC Measurement Procedure for DTS devices (Publication number 558074) where this is allowed or addressed.

R. The desired signal to be looked at is a span of 1.5MHz at 500 seconds sweep time. As our spectrum analyzer has a maximum sweep speed of 100 seconds the plot was broken down into five 100 seconds of 300kHz. Our software data collection program (VEE) then appended each of these segments to give a 1.5MHz 500 second plot. As the measurement procedure actually calls for a ratio (span/3kHz) each section of the plot still conforms. This bottom line just explains how the 1.5MHz plot was created.

5. The IC application form is missing the following information or has incorrect information entered into these sections:

- (a) Type of Service is not completed on the submitted IC application form,
- (b) If modular approval of this transmitter is acceptable, Type of Equipment should specify Spread Spectrum Device (2400-2483.5 MHz) and Modular Approval,
- (c) R. F. Power in Watts is expressed in units of dBm when it should be milliwatts, and
- (d) Occupied Bandwidth is incorrectly stated as 1.72 MHz when the Emission Designator uses 1.74 MHz. These numbers should agree.

*R .a) Type of Service 'Single' has been added To the Industry Canada Submission form.
b)The Modular approval has been added to the Type of Equipment.
c)The Conducted RF Power changed to 2.37mW on The Industry Canada Submission form
d) The Occupied bandwidth reported from the test report is 1.74MHz. The Industry Canada Submission form Occupied Bandwidth will be changed to reflect 1.74MHz Occupied Bandwidth.*

6. For Your Information – I strongly suggest that Cervis, Inc. schedule a meeting with members of the FCC Laboratory to find out if these transmitters from Cervis are eligible for approval as modular transmitters. I would be happy to arrange or attend such a meeting at Cervis' convenience. This is the second time that I disagree with the authorization of a Cervis transmitter as a modular transmitter. Also note that Public Notice DA 00-1407 is no longer in effect since the FCC Rules now incorporate provisions for approval of modular transmitters in Section 15.212 of the Rules. These rules include two types of modular transmitter approvals: single modular approval and split modular approval. TCBs cannot approve split modular transmitters.

R. The FCC has commented on this in the previous Cervis Base unit (FCC ID: LOBSBU200) allowing a modular approval for this kind of device

7. For Your Information - The Equipment Code entered in Section III, Item 4(a) of the FCC application form for this device should be DTS not DSS. DSS is used for frequency hopping spread spectrum transmitters while DTS is used for direct sequence spread spectrum transmitters. Please make a note of this for future FCC applications. I will correct equipment code on the FCC application form when I file it with the FCC.

R. Noted, No action needed.