



Washington Laboratories, Ltd.

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February 11, 2009

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

RE: Comments of January 21, 2009
APPLICATION: FCC ID: LOBSHH200 & IC: 7955A-SHH200 for Cervis, Inc..

Dear Mr. Fabina:

Below are the comments that you have provided regarding the application for certification referenced above. Our responses to those comments are in ***bold italic***. Many responses refer you to additional exhibit(s) which has been uploaded to the application folder at the ATCB website.

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 disagree with the response in item 1 of the amended modular approval request letter which states this device has an RF shield over the radio portion of this device. The internal photos of this handheld transmitter show no shield on the radio portion of this device. I believe this transmitter does not meet the condition in Section 15.212(a)(1)(i) of the FCC Rules for modular approval.

R. The original unit did not have the RF Shield. The new unit that was sent with the RF shield was tested to ensure the shield did not adversely affect the test results. New test set-up photos and external ET photos have been uploaded.

2) I disagree with the response in item 5 of the amended modular approval request letter which states this device was tested in a stand-alone condition via a PCMCIA card. Test set up photos indicate this handheld transmitter was tested without a PCMCIA card since it needs not connection for stand-alone testing. Please amend this response

R. Response has been amended.

3) I disagree with responses 1 and 2 under item 8 of the amended modular approval request letter because Public Notice DA-00-1407 has been replaced by Section 15.212 of the FCC Rules. Modular transmitter approvals must meet these conditions. Please address the conditions in the current FCC Rules and not an outdated FCC Public Notice.

R. Modular approval letter has been changed to reflect the correct rules.

4) I disagree with the responses 1 and 6 contained in ATCB comments response letter from Washington Laboratories. Modular approval of a base transmitter was addressed in FCC ID: LOBSBU200. Modular approval of a handheld transmitter was not addressed in FCC ID: LOBSBU200, therefore, the FCC has not agreed to modular approval of this handheld transmitter as a modular transmitter.

R. Refer to KDB Received for item #5 below.

5) Based on these new responses, I am submitting a Knowledge Database (KDB) inquiry to the FCC regarding modular approval of this handheld transmitter because when I participated in the development of the modular transmitter approval conditions in 1991, the FCC did not envision an approval like you are requesting for this handheld transmitter. If the FCC allows modular approval of this handheld transmitter, virtually every transmitter on the market is eligible for modular approval. The FCC did not envision this when the modular approval rules were set up. Among other things, the FCC will have to consider how Class II permissive changes to this type of modular transmitter must be addressed and how future approvals of this type will be handled.

R. KDB Received

6) The RF safety analysis for this handheld transmitter is incorrect. Since this device will be used with a distance (d) less than 2.5 cm from a person (worst case), you must demonstrate that either the EIRP or the conducted output power, whichever is higher, is below the low threshold stated in the FCC Exclusion List of July 17, 2002. This threshold is defined for general population exposure category as 60/fGHz mW. For 2441 MHz (the mid-band frequency), this works out to be 60/2.441 or 24.58 mW. The RF analysis based on distances less than 20 cm does not work for the equation $S = EIRP / 4\pi r^2$ because inside 20 cm the power density varies as r^3 and r^4 depending upon smaller distances of r .

R. A new RF Exposure statement has been uploaded.

7) For Your Information - Section 15.212(a)(1)(vi)(A) of the FCC Rules was not addressed by the modular approval request letter. Since the modular transmitter is on a PC board inside an enclosure and this PB board does not bear an FCC ID label, this transmitter will be approved via a limited modular approval for incorporation only into devices manufactured by Cervis, Inc

R. The label will be on the PC board, with another label in the battery compartment that states "Contains FCC ID..." a new label location photo will be uploaded to show this.